

Superfund Program Implementation Manual FY 09

Appendix B: Response Actions

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APPENDIX B: RESPONSE ACTIONS

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APPENDIX B: SITE ASSESSMENT/NPL LISTING

B.A. CURRENT PROGRAM PRIORITIES

B.A.1. Protect Human Health and the Environment

Protection of human health and the environment remains the highest priority for the Superfund Program. EPA will continue to address the worst sites first while balancing the need to complete response actions at sites. The Agency will ensure that available resources are disbursed in a fiscally sound manner. Maximizing Potentially Responsible Party (PRP) involvement remains a high priority.

a. Pipeline Management Review/RA Construction

As of October 1, 2006, Superfund had 1,557 final and deleted sites on the NPL, of which approximately 1,211 have final cleanup plans approved. As the program has matured, more sites have advanced to the construction phase. Superfund construction projects are technically complex and costly, and the growth in the number, size, duration and cost of these projects over time has resulted in a backlog of construction projects awaiting funding. Superfund cleanups directly support the Agency goal of ensuring that the Nation's land is protected.

Funding for Superfund construction projects is critical to achieving risk reduction and construction completion measures. Although funding levels for the program have remained relatively stable in recent years, the cost of the Superfund construction projects underway and those awaiting funding is increasing. As a result, a backlog of projects ready to begin construction but awaiting funding has developed.

The Agency is continuing the following internal actions to address the shortfall in funding by:

- (1) Reviewing the scope, budget and schedule of ongoing construction projects to ensure available resources are directed where they are immediately needed,
- (2) Reviewing construction start candidates to ensure that sites that present an immediate risk to human health are addressed, while balancing the programmatic need to complete construction at other sites,
- (3) Emphasizing 'enforcement first' to maximize the involvement of responsible parties in conducting cleanups, and making financial assurance arrangements to protect against the risk of default by a liable party on closure or clean-up obligations,
- (4) Aggressively pursuing alternative sources of funding to supplement annual appropriations. These include unexpended funds in program contracts and other funding agreements, and responsible party settlement resources that are available and can be used to finance response actions. EPA will use deobligated funds for remedial work at high priority sites.

The first priorities for response funding are classic emergencies and actions necessary to address immediate threats to human health. Ongoing RAs, mixed funding, and mixed work projects receive priority for funding over new cleanup work. New Fund-financed cleanup work (with the exception of emergency and time-critical removal actions) will be subject to priority ranking by the National Risk-Based Priority Panel and will be screened to ensure actions have been taken to compel all appropriate PRPs to conduct the cleanup. The Panel consists of representatives from each region and HQ (OSRTI and OSRE) and utilizes a risk-based environmental priority setting approach. New cleanup work is funded based on actual or potential risks to human health and the environment as well as the need to maintain construction progress. Determination on whether a project represents new or ongoing work will be made by the Panel. New cleanup work consists of large removal actions that exceed funding levels available within a region's baseline removal budget, as well as cleanup construction activities at sites. The panel meets one or more times a year for evaluation of projects.

b. Post Construction Completion

As a result of the increase in construction completion sites, the post construction workload required to ensure that the Superfund response actions remain protective of human health and the environment is also increasing. Post construction encompasses a number of discrete but related activities including: Five-Year Reviews; implementation, monitoring and enforcement of institutional controls; operation and maintenance long-term response actions; optimization of remedies; and deletion of sites from the NPL. EPA, states, Federal facilities, PRPs, local governments and communities all play an integral role in performing post construction activities. Five-Year Reviews are required by statute and program policy, generally when residual contamination remains on site after cleanup, or when remedies require more than five years to complete. Five-Year Reviews provide an opportunity to evaluate remedies, identify problems or deficiencies, and recommend adjustments to operations and maintenance where necessary. 2026 Five-Year Reviews have been completed as of the end of FY 2007. A Five-Year Review module has been added to CERCLIS to improve scheduling, tracking and reporting of Five-Year Review activities.

Institutional controls are administrative and/or legal mechanisms intended to minimize the potential for exposure to contamination and protect the integrity of a remedy. Examples of institutional controls include zoning restrictions, excavation and building permits, easements, covenants, deed notices, and advisories. Although institutional controls are recognized as critical remedy components, the challenge is that they are often implemented, monitored and enforced by entities other than those responsible for the cleanup. As a matter of policy, institutional controls are necessary if a site cannot support unlimited use and unrestricted exposure due to residual contamination and/or there are engineered remedy components that may be damaged by uncontrolled future site activities. Institutional controls can be used at any point in the cleanup; however, implementation frequently lags behind the completion of physical construction. Institutional controls do not need to be in place to achieve construction completion, but delays in implementing institutional controls will impact the ability to delete sites from the NPL. Institutional controls do need to be in place to delete sites from the NPL. In addition, per the 2007 *Guidance for Documenting and Reporting Performance in Achieving Land Revitalization* and *Guidance for Documenting and Reporting the Superfund Sitewide Ready for Anticipated Use Measure*, all institutional or other controls required in the Record of Decision or other remedy decision documents must be in place for a site to qualify for the 'Ready for Anticipated Use' (RAU) performance measure.

Operation and maintenance (O&M) is an important component of a Superfund response. Actions range from maintaining engineering containment structures (e.g., landfill covers) to operating ground water remediation systems. O&M is the responsibility of the Federal facility, PRP or state. EPA is responsible for assuring that the work is adequately performed for the life of the project. One exception is for Fund-financed ground water restoration systems where EPA retains operating responsibility for up to ten years (called Long Term Response Actions (LTRA)) prior to transferring the system to the state.

Once ground water remediation systems have been operating, opportunities may exist to optimize or more efficiently operate the system. EPA conducted pilot optimization studies and in August 2004, issued the 'Action Plan for Ground Water Remedy Optimization.' Optimization reviews can help provide assurances that these systems are operating efficiently prior to transfer to the state for long term operations. Optimization protocols also can be made available to PRPs and Federal facilities.

Sites can be deleted from the NPL once all response actions are complete, including implementation of institutional controls, and all cleanup levels have been achieved. As of the end of FY 2007, 321 sites were deleted from the NPL.

c. Superfund Alternative Sites

The category of 'Superfund Alternative (SA) sites' has been identified in OSWER 92-08.0-17, 'Revised Response Selection and Settlement Approach for Superfund Alternative Sites,' a directive issued on June 17, 2004, by OSRE and OSRTI. In order to provide accurate reporting of work and appropriate credit to EPA regions for cleanup of non-NPL sites as well as NPL sites, SA sites have been defined in the SPIM since September 16, 2002.

For purposes of this appendix, references to remedial pipeline activities [i.e., Remedial Investigation (RI), Feasibility Study (FS), Combined RI/FS, Remedial Design (RD), Remedial Action (RA)] at Superfund Alternative sites apply only to those PRP-lead activities at sites that the region has determined would

achieve a Hazard Ranking System (HRS) score greater than or equal to 28.5 and will need long term response action. Such response actions must be carried out in a manner not inconsistent with the National Contingency Plan (NCP). Sites proposed to the NPL may be included in this category. Regions should maintain adequate site documentation to support the 'Superfund Alternative' designation based on the criteria referenced above. Regions should seek PRP-lead for all remedial pipeline activities at Superfund Alternative sites; these sites must be PRP-lead for RAs. Credit for PRP-lead remedial pipeline activities at Superfund Alternative sites will only be given for activities conducted pursuant to enforceable order or agreement. Sites that meet these criteria should be identified in CERCLIS using the special initiatives indicator of 'Superfund Alternative.' The measures outlined below for remedial pipeline activities at Superfund Alternative sites are established with the intent of capturing environmental progress. Their establishment is not intended to affect established priorities for response resource allocation.

d. Agency for Toxic Substances and Disease Registry

Superfund has a close working relationship with the Agency for Toxic Substances and Disease Registry (ATSDR), the lead public health agency responsible for implementing the health-related provisions of CERCLA. ATSDR's mission is to serve the public by using the best science, taking responsive public health actions, and providing trusted health information to prevent harmful exposure and disease related to toxic substances. ATSDR is charged with assessing health hazards at specific Superfund sites, helping to prevent or reduce exposure and the illnesses that result, and increasing knowledge and understanding of the health effects that may result from exposure to hazardous substances. ATSDR works closely with state, local, and other federal agencies to reduce or eliminate harmful health effects that are related to exposure to toxic substances at waste disposal and spill sites.**

ATSDR's mission is supported by five goals, which are included in the agency's 5-year strategic plan for 2002 through 2007. These goals are as follows:

Goal 1C Prevent ongoing and future exposures and resultant health effects from hazardous waste sites and releases.

Goal 2C Determine human health effects associated with exposure to Superfund-related priority hazardous substances.

Goal 3C Mitigate the risks of human health effects at toxic waste sites with documented exposures.

Goal 4C Build and enhance effective partnerships.

Goal 5C Promote effective and efficient agency management. ATSDR will continue to work closely with Superfund, collaborating to protect the public's health and providing health-related information to help prevent harmful exposures.

B.A.2. Maximize Program Effectiveness and Efficiency

To maximize the effectiveness and efficiency of the Superfund program during FY08/09, EPA HQ and regions will work to improve the implementation of the program based on the following processes.

a. Innovative Technologies

Environmental technology development and commercialization are a top national priority for this Administration. EPA is committed to encouraging the use of new or innovative technologies for the characterization and treatment of contaminated soils and ground water. Over the next decade, the Superfund program and other federal agencies will spend billions of dollars each year to clean up sites contaminated with hazardous wastes. This commitment will require the use of a wide range of site remediation processes. While existing technologies that characterize and remediate contaminated sites have been successful, the investment in site cleanup provides new opportunities for the development of less expensive and more effective solutions.

The Agency has made considerable progress using new technologies in Superfund. More than half of the recent remedial cleanup decisions for source control call for technologies that were not available when the law was reauthorized in 1986. The large cleanup needs remaining in EPA programs, as well as the

formidable future requirements for state and other federal agencies, provide a continuing impetus to find more effective and less costly solutions.

The unique and varying problems posed by contaminated sites present a challenge that requires knowledge and techniques from different technical disciplines. The solutions to these problems are not to be found in existing design manuals or standards of practice. Rather, EPA is developing procedures as it goes along by creatively applying technologies from various industrial applications to unique site conditions. This field of hazardous site remediation is rapidly evolving and requires considerable effort to remain informed of recent developments.

EPA is working with stakeholders in other federal agencies and in the private sector to identify better, faster, and less expensive options for cleanup. EPA is documenting the use of new treatment technologies at hazardous waste sites to benchmark current capabilities and capture the lessons learned. In addition EPA is improving procedures that are used for site characterization by integrating new technical advancements into practice.

The Agency is also very committed to the dissemination of information on technology development, evaluation and deployment. Electronic information resources offer the best hope for keeping pace with rapid developments in this field. The Clean-Up Information (CLU-IN) web site at <http://clu-in.org> offers waste professionals a rich source of current information on technologies and markets. The TechDirect monthly electronic-mail service offers subscribers up-to-date information on new remediation technology products and services developed by EPA.

b. Effective Contract Management

Good contract management is a Superfund priority, as well as an Agency-wide priority. In this regard, in 1996, the Agency established a national workgroup to develop a new Superfund acquisition strategy for the year 2000 and beyond. The Contracts 2000 strategy was built upon the Long Term Contracting Strategy (LTCS) paradigm. The new strategy retained two key tenets of LTCS - a one-program approach and decentralization of contracts management to the regions - and kept the LTCS contracts infrastructure in place.

The Contracts 2000 strategy report and implementation framework were issued in 1999. The major goals of Contracts 2000 were: 1) balancing national consistency with regional flexibility; 2) introducing more competition into the contracting process; 3) increasing small, small disadvantaged, and women-owned business participation in the Superfund contracting program; 4) adopting new contracting vehicles and methods such as performance-based contracting, and fixed price contracting; and 5) developing 'performance focused' statements of work for all of the follow-on contracts.

Under Contracts 2000, the Agency awarded 76 contracts for the START (Superfund Technical Assessment and Response Team), ERRS (Emergency and Rapid Response Services), ESS (Enforcement Support Services), ROC (Regional Oversight Contracts), and ESAT (Environmental Services Assistance Teams) contracts and developed a strategy for acquiring Superfund design and construction services when the current Response Action Contracts (RACs) expire. Thirty-one of these contracts were awarded as 8(a) or small business. Superfund contracts are mostly operated out of EPA's ten regional offices. The next generation of Superfund contracts are being procured as these contracts expire.

The Contracts 2000 strategy was further refined for design and construction. The RACs are being replaced by the RACs 2 using a menu approach where regions have a choice of several contracts: Remedial Design, Remedial Action, Full-Service, Site-Specific, Interagency Agreements, and Cooperative Agreements. The RACs 2 are the Full-Service contracts that are identical in scope to the RACs. The RACs 2 Lite (also known as Architect & Engineering Services (AES)) perform the design portion, but do not include construction in the scope. Construction is then performed using one of the other options such as a Site-Specific contract.

c. Superfund Redevelopment Initiative

Superfund cleanups address real threats to public health and the environment and have been instrumental in returning sites to productive uses. In the last six years, EPA has become increasingly aware of the importance of fully exploring future use opportunities at Superfund sites with its partners before selecting

and implementing cleanup remedies. This shift in thinking has resulted in Superfund sites, which were once thought to be unusable, being 'recycled' back into productive use. EPA is encouraging the reuse of Superfund sites by working to remove barriers to site use and making cleanup decisions that are consistent with intended reuse. Large and small businesses, shipping terminals, community libraries, sports fields, and golf driving ranges are just a few of the many ways in which Superfund sites are being reused following their cleanup.

EPA is working with stakeholders at Superfund sites across the country that have been cleaned up yet remain vacant due to real or perceived barriers to their reuse. At many of these sites, communities, local governments, landowners, and other site stakeholders are joining with the Agency to move forward with reuse in a manner that does not interfere with the cleanup remedy and maintains protection of human health and the environment at the site. These site-specific partnerships are key elements of 'demonstration projects' for the Agency's Return to Use (RTU) Initiative. Partnerships at RTU demonstration projects can be as formal or informal as stakeholders wish, ranging from the most informal arrangement between community representatives and EPA Regional representatives, to a Memorandum of Understanding between Regional offices and local stakeholders.

Examples of EPA's activities to support demonstration projects include:

- making information about the sites more available, using tools such as Ready for Reuse Determinations where appropriate;
- pointing communities to tools and resources, such as comfort letters and involuntary acquisition fact sheets, that relate to liability issues;
- connecting communities with national organizations that have worked with EPA on reuse issues, such as the U.S. Soccer Foundation and the Academy of Model Aeronautics; and
- working with communities that are creating site reuse plans to explain which activities would not affect the integrity of the remedy.

EPA intends to use the lessons learned from the initial demonstration projects to evaluate partnership strategies, develop policy and guidance, and continue appropriate consideration of anticipated future land use during the Superfund cleanup process.

On November 10, 2004, EPA announced the Return to Use Initiative, the next step for SRI, aimed primarily at vacant Construction Complete sites. Eleven demo projects were selected. Regions are now evaluating additional sites for reuse potential under this program. Under SRI, pilot projects are selected by regions to enhance the involvement of local governments in determining the potential future uses of Superfund sites and to demonstrate tools that can be used to facilitate redevelopment. Approximately 30 demonstration projects have been awarded to date. All demonstration projects are being monitored and evaluated for lessons learned and potential future program enhancements. The other components of SRP include: revisions to policy and guidance, where needed, and new guidance and technical tools; outreach to share information about site reuses, the tools that can help stakeholders repeat those successes at other sites, and the reuse potential of specific sites; and partnerships with other public and private entities with resources or other capabilities to support the redevelopment of the sites. (Please see the Superfund Redevelopment web site at www.epa.gov/superfund/programs/recycle/index.htm). The reuse of Superfund sites is taking place now, and thanks to a coordinated national effort, EPA will be accomplishing even more.

d. Cross-Program Revitalization Measure

The Federal Facilities and Superfund Programs are implementing the OSWER-wide Cross-Program Revitalization Measures effort by tracking the number of actually or potentially contaminated, or previously contaminated, sites and surface acres that are "Protective for People Under Current Conditions" (PPF) and "Ready for Anticipated Use" (RAU).

Sites and surface acres tracked by these measures will include investigated land, wetlands, surface water, and/or sediments for which these programs have a documented oversight role for any necessary assessment, remedial action, and/or property transfer. The Federal Facilities and Superfund Programs are using the current Human Exposures Under Control Environmental Indicator as basis for determining whether sites and acres are PPF. The PPF measure captures the number of acres at a site for which there are no complete pathways for human exposure to unacceptable levels of contamination based on current site conditions.

In order to meet the RAU measure, sites and acres must 1) have all cleanup goals achieved for media that may affect current and reasonably anticipated future land uses such that there is no unacceptable risk, and 2) have all institutional or other controls identified as part of the response action as necessary for the site's long-term protection be properly in place and effective. The Programs are also tracking two optional indicators, Status of Use and Type of Use. These indicators describe how the acres are being used when the determination is made for the PFP and RAU performance measures.

Acres and sites that meet CPRM PFP and/or RAU criteria as well as Status and Type of Use information will be documented via a checklist and entered in CERCLIS. Acres will be measured on an OU basis. CERCLIS has been updated to accommodate the land revitalization measures and the changes were released in June 2007. Headquarters has provided training opportunities, frequently asked questions, and quick reference guides that were designed to facilitate the Regions' data collection and entry processes.

Cross-Program Revitalization Measures (CPRM) Indicators

Definition: The CPRM indicators and performance measures establish a similar, consistent set of measures that can be applied across all OSWER cleanup programs. OSRTI and FFRRO implemented the following three indicators and two performance measures established in the March 2007 CPRM Guidance:

Indicators:

- *Universe Indicator (mandatory):* This indicator is designed to capture the full universe of potential sites and land area, as measured in acres, to be addressed by the CPRM measures. It includes: proposed, final, and deleted NPL sites, (including Federal facilities); SA sites; NTCRA sites; and certain non-NPL Federal facilities and FUDS¹.
- *Status of Use Indicator (voluntary):* This indicator captures information about whether a site or any land area therein, as measured in acres, is being used. Sites and acres will be classified as either unused, in continued use, reused, planned reuse, or undetermined.
- *Type of Use Indicator (voluntary):* This indicator describes the specific use at a site or any land area therein, as measured in acres, at the point in time when the Status of Use determination is made. Sites and acres will be classified under one of the following ten primary categories: Commercial, Public Service, Industrial, Military, Other Federal, Mixed, Residential, Agricultural, Ecological, Recreational, and Undetermined.

Status of Use Optional Indicator: The Status of Use Indicator refers to how the acres of the sites and OUs included in the Universe Indicator are being used at the point in time when the determination is made for the PFP and RAU performance measures. The Status of Use Indicator has the following sub-indicators:

- *Continued Use:* Acres in continued use refers to areas that are being used in the same general manner as they were when the site became subject to the Superfund or Federal Facilities Programs.
- *Reused:* Acres at a site identified as in reuse refers to a site or OU where a new use, or uses, are occurring such that there has been a change in the type of use (e.g., industrial to commercial), or the property was unused and now supports a specific use. This means that the developed site or OU is actually used for its intended purpose by customers, visitors, employees, residents, or fauna, in the case of ecological reuse.
- *Planned Reuse:* Acres in planned reuse include sites or OUs where a plan for a reuse is in place, but reuse has not yet begun. This could include conceptual plans, a contract with a developer, secured financing, approval by the local government, or the initiation of site redevelopment.
- *Unused:* Acres identified as unused include sites or OUs not being used in any identifiable manner. This could be, for example, because site investigation and cleanup are ongoing, operations have ceased, the owner is in bankruptcy, or cleanup is complete, but the site remains vacant.
- *Undetermined:* Acres at a site or OU that cannot be currently identified as one of the four Statuses of Use.

¹ This includes those non-NPL Federal facilities (such as Base Realignment and Closure (BRAC) or formerly Used Sites Remediation Action Program (FUSRAP) sites) and FUDs where EPA has signed/concurred on a response action (at a minimum, completed a Remedial Investigation/Feasibility Study (RI/FS), removal action, or other major cleanup decision document) or a property transfer.

The Status of Use Indicator is independent of the status of response action because it recognizes that sites or OUs could be in various stages of use at various stages of cleanup and because use and reuse can change.

Type of Use Optional Indicator: The Type of Use Indicator describes how acres at sites or OUs included in the Universe Indicator are used at the point in time when the PFP or RAU determination is made. Information on the type of use at a site or OU should be classified under one of the following six primary categories:

Commercial

- *Commercial Use:* Commercial use refers to use for retail shops, grocery stores, offices, restaurants, and other businesses.

Public Service

- *Public Service Use:* Public service use refers to use by a local or State government agency or a non-profit group to serve citizens' needs. This can include transportation services such as rail lines and bus depots, libraries and schools, government offices, public infrastructure such as roads, bridges, utilities, or other services for the general public.

Agricultural Use

- *Agricultural Use:* Agricultural use refers to use for agricultural purposes, such as farmland for growing crops and pasture for livestock. Agricultural use also can encompass other activities, such as orchards, agricultural research and development, and irrigating existing farmland.

Recreational Use

- *Recreational Use:* Recreational use refers to use for recreational activities, such as sports facilities, golf courses, ball fields, open space for hiking /picnicking, and other opportunities for indoor or outdoor leisure activities.

Ecological Use

- *Ecological Use:* Ecological use refers to areas where proactive measures, including a conservation easement, have been implemented to create, restore, protect, or enhance a habitat for terrestrial and/or aquatic plants and animals, such as wildlife sanctuaries, nature preserves, meadows, and wetlands.

Industrial

- *Industrial Use:* Industrial use refers to traditional light and heavy industrial uses, such as processing and manufacturing products from raw materials, as well as fabrication, assembly, treatment, and packaging of finished products. Examples of industrial uses include factories, power plants, warehouses, waste disposal sites, landfill operations, and salvage yards.

Military

- *Military Use:* Military use refers to use for training, operations, research and development, weapons testing, range activities, logistical support, and/or provision of services to support military or national security purposes.

Other Federal

- *Other Federal Use:* Other Federal use refers to use to support the Federal government in Federal agency operations, training, research, and/or provision of services for purposes other than national security or military.

Mixed

- *Mixed Use:* Mixed use refers to areas at which uses cannot be differentiated on the basis of acres. For example, a condominium with retail shops on the ground floor and residential use on the upper floors would fall into this category. When selecting Mixed Use, the individual types of uses should be identified, if possible.

Residential

- *Residential Use:* Residential use refers to use for residential purposes, including single-family homes, town homes, apartment complexes and condominiums, and child/elder care facilities.

Undetermined

- *Undetermined:* Undetermined refers to acres at a site or OU that cannot be identified as one of the six Types of Use.

The CPRM indicators and performance measures will have their first data pull on October 5, 2007 and will be pulled at least quarterly thereafter.

B.B. OVERVIEW OF FY 08/09 RESPONSE ACTIONS TARGETS/MEASURES

The Superfund Comprehensive Accomplishments Plan (SCAP) is used by the Assistant Administrator for the Office of Solid Waste and Emergency Response (AA OSWER), Assistant Administrator for the Office of Enforcement and Compliance Assurance (AA OECA), and senior Superfund managers to monitor progress each region is making towards achieving the Government Performance and Results Act (GPRA) annual performance goals. In addition, SCAP will continue to be used as an internal management tool to project and track activities that contribute to these GPRA goals and support resource allocation. The program will set national goals based on historical performance and performance expectations within a limited budget for the performance goals in GPRA and track accomplishments in the activities contributing to those goals. Regions should continue to plan and report accomplishments in CERCLIS as they have traditionally. To more clearly reflect the relationship between GPRA and the SCAP process, GPRA annual performance goals and measures and program targets and measures are defined as follows:

- **GPRA Annual Performance Goals (APG) and GPRA Annual Performance Measures (APM)** - The Agency's Annual Plan describes the specific annual performance goals, annual measures of outputs and outcomes, and activities aimed at achieving the performance goals that will be carried out during the year. APGs are the specific activities that the Agency plans to conduct during the fiscal year in an effort towards achieving its long-term strategic goals and objectives. APMs are used by managers to determine how well a program or activity is doing in achieving milestones that have been set for the year. The annual performance goals will inform Congress and Agency stakeholders of the expected level of achievement for the significant activities covered by the GPRA objective. The goals are a subset of the overall planning and budgeting information that has traditionally been tracked by the Superfund program offices.
- **Program Targets and Measures** cover activities deemed essential to overall program progress. Program targets project the number of actions that each region is expected to perform during the year and are used to evaluate progress in achieving program priorities. Program measures are parameters established for evaluating these program priorities. Targets are set for the various program measures. For Five Year Reviews, program targets are used to identify and track the specific number of sites, not actions. For statutory reasons, these sites must be targeted site specifically and cannot be substituted for other sites.

The following pages contain, in pipeline order, the definitions of the FY 08/09 remedial activities, GPRA annual performance goals, GPRA and program measures, and remedial project support activities. Exhibit B.1 displays the full list of remedial activities defined in this Appendix. Exhibit B.4 at the end of Appendix B lists the subject matter experts for each relevant subject area.

EXHIBIT B.1. RESPONSE ACTION ACTIVITIES

ACTIVITY	GPRA	PROGRAM	
		Target	Measure
Remedial Investigation (RI) Starts (NPL & Superfund Alternative)			T
Feasibility Study (FS) Starts (NPL & Superfund Alternative)			T

ACTIVITY	GPRA	PROGRAM	
		Target	Measure
Combined RI/FS Starts (NPL & Superfund Alternative)			T
Treatability Studies			T
Start of Public Comment Period (Proposed Plan to Public) (NPL & Superfund Alternative)			T
RI/FS Duration (NPL & Superfund Alternative)			T
Decision Document Developed			T
Final Remedy Selected	See Appendix G		
Engineering Evaluation/Cost Analysis (EE/CA)			T
RD Start (NPL & Superfund Alternative)			T
RD Completion (NPL & Superfund Alternative)			T
RA Start (NPL & PRP-lead Superfund Alternative)			T
RA Contract Award (NPL & PRP-lead Superfund Alternative)			T
Start of On-Site Construction			T
Operational and Functional (O&F)			T
Completion of a Response Action/Activity (NPL & PRP-lead Superfund Alternative)			T
NPL Site Construction Completions	See Appendix G		
Long-Term Response Action (LTRA & PRP LR) (NPL & PRP-lead Superfund Alternative) Starts			T
Long-Term Response Action (LTRA & PRP LR) (NPL & PRP-lead Superfund Alternative) Completions			T
Operation and Maintenance (O&M)			T

ACTIVITY	GPRA	PROGRAM	
		Target	Measure
Cleanup Goals Achieved			T
NPL Site Completions			T
Five Year Reviews		T	
Partial NPL Deletion			T
Final NPL Deletion			T
Sitewide Ready for Anticipated Use	See Appendix G		
Protective for People Under Current Conditions			T
Ready for Anticipated Use			T
Long-Term Human Health Protection Indicator	See Appendix G		
Migration of Contaminated Ground Water Under Control	See Appendix G		
Populations Protected			T
Cleanup Volumes			T
Support Agency Assistance			T
Technical Assistance			T
Pre-Design Assistance			T

Note: Accomplishments are updated and reported on a daily basis. Selected National reports are run quarterly.

a. Remedial Investigation (RI) Starts (NPL & Superfund Alternative)

Definition:

The purpose of the RI is to collect data necessary to adequately characterize the site for the purpose of developing and evaluating effective remedial alternatives. The RI provides information to assess the risks to human health and the environment and to support the development, evaluation, and selection of appropriate response alternatives.

The RI may be conducted alone, as part of a site-wide integrated ESI/RI assessment, or as a combined Remedial Investigation/Feasibility Study (RI/FS). The start of an RI/FS is a program measure. The RI start

and RI/FS start definitions are the same. Regions are not required to enter the RI start date if the RI is being conducted as part of an ESI/RI or RI/FS.

Obligation of funds for forward planning, community relations and/or other support activities do not constitute a RI start. The appropriate use of Special Account funds for remedial investigations is provided in the "Guidance on Key Decision Points in Using Special Account Funds" dated September 28, 2001.

Definition of Accomplishment:

Fund-financed (Including F-, TR - and S-lead actions) - Credit for a Fund-financed RI (Action Name = Remedial Investigation) start at an NPL or Superfund Alternative site is received when funds are obligated and the actual start date (Actual Start) has been recorded in CERCLIS. Funds are obligated when:

- The contract modification or work assignment/task order for the RI has been signed by the EPA Contracting Officer (CO); or
- An IAG has been signed by the other federal agency [Bureau of Reclamation (BUREC) or USACE]; or
- A Cooperative Agreement has been signed by the Regional Administrator or designee to conduct a RI.

If a subsequent RI is initiated without a new obligation of funds, the start date as recorded in CERCLIS is defined as EPA's written approval of the work plan for the subsequent RI.

PRP- financed from a Special Account (Including Special Account Financed Action performed by EPA (SA-lead), the State (SS-lead), or Tribal Government (ST-lead) actions) - Credit for a special account-financed RI (Action Name = Remedial Investigation) start at an NPL or Superfund Alternative site is received when funds are obligated and the actual start date (Actual Start) of the RI has been recorded in CERCLIS. Funds are obligated when:

- The contract modification or work assignment/task order for the RI has been signed by the EPA Contracting Officer; or
- An IAG has been signed by the other federal agency (BUREC or USACE); or
- A Cooperative Agreement has been signed by the Regional Administrator or designee to conduct a RI.

If a subsequent RI is initiated without a new obligation of funds, the start date as recorded in CERCLIS is defined as EPA's written approval of the work plan for the subsequent RI.

PRP-financed under federal enforcement (Includes RP- and MR-lead actions) - A PRP- financed RI (Action Name = PRP RI) under federal enforcement at an NPL or Superfund Alternative site starts when one of the following enforcement actions occurs:

- An Administrative Order on Consent (AOC), in which the Potentially Responsible Parties (PRPs) agree to conduct the RI, is signed by the Regional Administrator or delegate. The RI start date (Actual Start) is the date the AOC is signed. This is reported in CERCLIS as the AOC (Action Name = Administrative Order on Consent) completion date (Actual Complete); or
- The date (Actual Complete) the PRPs provide notice of intent to comply (SubAction Name = PRP Notify EPA of Intent to Comply) with a UAO for a RP-lead RI signed (Actual Complete) by the designated regional official (Action Name = Unilateral Admin Order) and the Response Act Pd by Parties of "PRP RI"; or
- A Consent Decree (CD), in which the PRPs agree to conduct the RI, is referred by the region to Department of Justice (DOJ) or HQ. The RI start date (Actual Start) is the date the Regional Administrator signs the memo transmitting the CD to HQ or DOJ. This is recorded in CERCLIS as the CD (Action Name = Consent Decree) actual start date (Actual Start).

PRP-financed under State enforcement (PS-lead actions) - A PRP-financed RI (Action Name = PRP RI) under state enforcement at a NPL or Superfund Alternative site starts when a state order or comparable enforcement document (Action Name = State Order or State Decree), in which the PRPs agree to conduct the RI, is signed by the last appropriate state official or party (Actual Complete) and the site is covered by one of the following:

- State enforcement Cooperative Agreement signed by the Regional Administrator; or

- Superfund Memorandum of Agreement (SMOA) signed by the appropriate state and regional official containing a schedule for RI work at the site; or
- A general SMOA signed by the appropriate state and regional officials covering remedial work to be undertaken with schedules defined before work commences; or
- Other state/EPA agreement signed by the appropriate state and regional official.

If a subsequent RI is initiated without a new or amended AOC, CD, state order, or other comparable state enforcement document, the start date for the RI as recorded in CERCLIS is documented by a letter, form, or memo from EPA or the state approving the work plan for the subsequent RI.

If an AOC, state order, or other comparable state enforcement document is amended for the subsequent RI, the start date is the date the last state official or Regional Administrator/delegate signs the amendment. If a federal CD is amended, the start date is the date on which the memo transmitting the CD to HQ or DOJ is signed by the Regional Administrator.

In-house (EP-lead action) - Credit for an in-house RI (Action Name = Remedial Investigation) start at a NPL or Superfund Alternative site is received on the date that the region conducts the initial RI scoping meeting. The start (Actual Start) is documented by a memo to file containing the minutes from the meeting.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Regions are not required to enter the RI start date if the RI is being conducted as part of an RI/FS or site-wide ESI/RI. The RI actual start date is reported site-specifically in CERCLIS. For PRP-financed RIs, both the RI start (Actual Start) and the CD start (Actual Start) or AOC, state order, or state decree or notice of intent to comply with a UAO completion dates (Actual Complete) must be entered into CERCLIS; the RI start and enforcement dates should be the same date. Funds for RIs and RI oversight are found in the pipeline operations AOA. Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator of "Superfund Alternative." This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/Date Requirements	Data Must Be Entered By
Action name = Remedial Investigation (RI)	Program Measure	F, TR, S, SA, SS, ST	Contract modification or work assignment/task order; or An IAG; or Cooperative Agreement.	Signed by EPA Contracting Officer; or Signed by other federal agency; Signed by Regional Administrator or designee.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

b. Feasibility Study (FS) Starts (NPL & Superfund Alternative)

Definition:

The primary objective of a FS is to ensure that appropriate remedial alternatives are developed and evaluated such that an appropriate remedy may be selected.

The FS may be conducted alone or as part of a combined RI/FS. FS Starts and combined RI/FS starts is a program measure. Regions are not required to enter the FS start date if the FS is being conducted as part of a combined RI/FS. Obligation of funds for forward planning, community relations and/or other support activities does not constitute an FS start.

The appropriate use of Special Account funds for feasibility studies is provided in the "Guidance on Key Decision Points in Using Special Account Funds" dated September 28, 2001.

Definition of Accomplishment:

Fund-financed (Including F , TR- and S lead actions) - Credit for a Fund-financed FS (Action Name = Feasibility Study) start at an NPL or Superfund Alternative site is received when funds are obligated and the actual start date (Actual Start) is entered into CERCLIS. Funds are obligated when:

- The contract modification or work assignment/task order for the FS has been signed by the EPA CO; or
- An IAG has been signed by the other federal agency (USACE or BUREC); or
- A Cooperative Agreement has been signed by the Regional Administrator or his designee to conduct a FS. If a first or subsequent FS is initiated without a new obligation of funds, the start date as recorded in CERCLIS is defined as the date of EPA's written approval of the work plan for the FS

PRP- financed from a Special Account (Including Special Account Financed Action performed by EPA (SA-lead), the State (SS-Lead), or Tribal Government (ST-lead) actions) - Credit for a special account-financed FS (ActionName = Feasibility Study) start at a NPL or Superfund Alternative site is received when funds are obligated and the actual start date (Actual Start) is entered into CERCLIS. Funds are obligated when:

- The contract modification or work assignment/task order for the FS has been signed by the EPA Contracting Officer; or
- An IAG has been signed by the other federal agency (USACE or BUREC); or
- A Cooperative Agreement has been signed by the Regional Administrator or designee to conduct a FS.

If a first or subsequent FS is initiated without a new obligation of funds, the start date as recorded in CERCLIS is defined as the date of EPA's written approval of the work plan for the FS.

PRP-financed under federal enforcement (Including RP- and MR-lead actions) - A PRP- financed FS (Action Name = PRP FS) under federal enforcement at a NPL or Superfund Alternative site starts when one of the following enforcement actions occurs:

- An AOC that addresses FS activities is signed by the Regional Administrator or delegate. The FS start date (Actual Start) is the date the AOC is signed. This is recorded in CERCLIS as the AOC (Action Name = Administrative Order on Consent) actual completion date (Actual Complete); or
- The date (Actual Complete) the PRPs provide notice of intent to comply (SubAction Name = PRP Notify EPA of Intent to Comply) with a UAO for a RP-lead FS signed (Actual Complete) by the designated regional official (Action Name = Unilateral Admin Order) and the Response Acts Pd by Parties of "PRP FS"; or
- The Regional Administrator signs the memorandum transmitting the CD to DOJ or HQ that addresses FS activities is referred by the region to DOJ or HQ. The FS start date (Actual Start) is the date (Actual Start) the Regional Administrator signs the memorandum transmitting the CD (Action Name = Consent Decree) to DOJ or HQ.

PRP-financed under State enforcement (PS- lead actions) - A PRP-financed FS (Action Name = PRP FS) under state enforcement at a NPL or Superfund Alternative site starts when a state order or comparable enforcement document (Action Name = State Order or State Decree), in which the PRPs agree to conduct the FS, is signed by the last appropriate state official or party (Actual Complete), and the site is covered by one of the following:

- State enforcement Cooperative Agreement signed by the Regional Administrator; or
- SMOA signed by the appropriate state and regional official containing a schedule for FS work at the site; or
- Other state/EPA agreement signed by the appropriate state and regional official.
- If a first or subsequent FS is initiated without a new or amended AOC, CD, state order, or other comparable state enforcement document, the start date of the FS is documented by a letter, form, or memo from EPA or the state approving the work plan for the subsequent FS.

If an AOC, state order, or other comparable state enforcement document is amended for the first or subsequent FS, the actual start date is the date the last state official or the Regional Administrator/delegate

signs the amendment. If a federal CD is amended, the start date is the date the Regional Administrator signs the memo transmitting the CD to HQ or DOJ.

In-house (EP-lead action) - Credit for an in-house FS (Action Name = Feasibility Study) start at a NPL or Superfund Alternative site is received on the date that the region conducts the initial FS scoping meeting. The start date (Actual Start) is documented by a memo to file containing the minutes from the meeting.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Regions are not required to enter the FS start date if the FS is being conducted as part of a combined RI/FS. The FS actual start date is entered into CERCLIS site-specifically. For a PRP-financed FS, both the FS start date (Actual Start) and the CD start date (Actual Start), or, AOC, state order or state decree or the notice of intent to comply with a UAO actual completion date (Actual Complete) must be entered into CERCLIS; the RI start and enforcement dates should be the same date. Funds for FS and FS oversight are contained in the pipeline operations AOA. Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator by designating these sites as "Superfund Alternative." This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Feasibility Study (FS)	Program Measure	F, TR, S, EP	Contract modification or work assignment/ task order; or IAG; or Cooperative Agreement; or	Signed by the EPA CO; Signed by other federal agency (USACE or BUREC); Signed by the Regional Administrator or his designee.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Feasibility Study (FS)	Program Measure	SA, SS, ST	Contract modification or work assignment/ task order for the FS; or An IAG; or Cooperative Agreement.	Signed by EPA Contracting Officer; Signed by other federal agency (USACE or BUREC); Signed by Regional Administrator or designee.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP FS (NK)	Program Measure	RP, MR	AOC; or Notice of intent to comply with a UAO; or Memo transmitting CD to DOJ or HQ.	Signed by Regional Administrator or delegate;	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP FS (NK)	Program Measure	PS	State order, or comparable enforcement document State enforcement Cooperative	Signed by all appropriate state officials or parties Signed by Regional Administrator Signed by appropriate state and regional official Signed by	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
			Agreement; SMOA; or Other state/EPA agreement.	the appropriate state and regional official.	fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

c. Combined RI/FS Start (NPL & Superfund Alternative)

Definition:

The purpose of the RI/FS is to assess site conditions and evaluate alternatives to the extent necessary to select a remedy.

The start of an RI/FS is a program measure. The RI/FS start and the RI start definition are the same. Regions are not required to enter the RI start date if the RI is being conducted as part of an RI/FS or a site-wide ESI/RI. Regions are not required to enter the FS start date if the FS is being conducted as part of a RI/FS.

Obligation of funds for forward planning, community relations and/or other support activities do not constitute an RI/FS start.

The appropriate use of Special Account funds for remedial investigations/feasibility studies is provided in the "Guidance on Key Decision Points in Using Special Account Funds" dated September 28, 2001.

Definition of Accomplishment:

Fund-financed (Including F , TR- and S lead actions) - Credit for a Fund-financed RI/FS (Action Name = Combined RI/FS) start at a NPL or Superfund Alternative site is received when funds are obligated and the actual RI/FS start date (Actual Start) is reported in CERCLIS. Funds are obligated when:

- The contract modification or work assignment/task order for the RI/FS has been signed by the EPA CO; or
- An IAG has been signed by the other federal agency (USACE or BUREC); or
- A Cooperative Agreement has been signed by the Regional Administrator or designee to conduct a RI/FS.

If a first or subsequent RI/FS is initiated without a new obligation of funds, the start date is defined as the date of EPA's written approval of the work plan for the RI/FS.

PRP- financed from a Special Account (Including Special Account Financed Action performed by EPA (SA-lead), the State (SS-Lead), or Tribal Government (ST-lead) actions) - Credit for a special account-financed RI/FS (Action Name = Combined RI/FS) start at a NPL or Superfund Alternative site is received when funds are obligated and the actual RI/FS start date (Actual Start) is reported in CERCLIS. Funds are obligated when:

- The contract modification or work assignment/task order for the RI/FS has been signed by the EPA CO; or
- An IAG has been signed by the other federal agency (USACE or BUREC); or
- A Cooperative Agreement has been signed by the Regional Administrator or designee to conduct a RI/FS.

If a first or subsequent RI/FS is initiated without a new obligation of funds, the start date is defined as the date of EPA's written approval of the work plan for the RI/FS.

PRP-financed under federal enforcement (Includes RP- and MR-lead actions) - A PRP-financed RI/FS (Action Name = PRP RI/FS) under federal enforcement at a NPL or Superfund Alternative site starts when one of the following enforcement actions occurs:

- An Administrative Order on Consent (AOC), in which the PRPs agree to conduct the RI/FS, is signed by the Regional Administrator or delegate. The RI/FS start date (Action Name = PRP

RI/FS) is the date the AOC is signed. This is recorded in CERCLIS as the AOC (Action Name = Administrative Order on Consent) completion date (Actual Complete); or

- The date (Actual Complete) the PRPs provide notice of intent to comply (SubAction Name = PRP Notify EPA of Intent to Comply) with a UAO for a RP-lead RI/FS signed (Actual Complete) by the designated regional official (Action Name = Unilateral Admin Order), and the Response Acts Pd by Parties of “PRP RI/FS”; or
- A Consent Decree (CD), in which the PRPs agree to conduct the RI/FS, is referred by the region to DOJ or HQ. The RI/FS start date (Actual Start) is the date the Regional Administrator signs the memo transmitting the CD to HQ or DOJ. This is recorded in CERCLIS as the CD (Action Name = Consent Decree) actual start date (Actual Start).

PRP-financed under State enforcement (PS-lead actions) - A PRP-financed RI/FS (Action Name = PRP RI/FS) under state enforcement at a NPL or Superfund Alternative site starts when a state order or comparable enforcement document (Action Name = State Order or State Decree), in which the PRPs agree to conduct the RI/FS, is signed by the last appropriate state official or party (Actual Complete) and the site is covered by one of the following:

- State enforcement Cooperative Agreement signed by the Regional Administrator; or
- SMOA signed by the appropriate state and regional official containing a schedule for RI/FS work at the site; or
- Other State/EPA agreement signed by the appropriate state and regional officials.

If a first or subsequent RI/FS is initiated without a new or amended AOC, CD, state order, or other comparable state enforcement document, the start date of the RI/FS is documented by a letter, form, or memo from EPA or the state approving the work plan for the subsequent RI/FS.

If an AOC, state order, or other comparable state enforcement document is amended for the first or subsequent RI/FS, the start date is the date on which the last state official or Regional Administrator/ delegate signs the amendment. If a CD is amended, the start date is the date the Regional Administrator signs the memorandum transmitting the CD to DOJ or HQ.

In-house (EP-lead action) - Credit for an in-house RI/FS (Action Name = Combined RI/FS) start at a NPL or Superfund Alternative site is received when the region has the initial RI/FS scoping meeting and the date is entered into CERCLIS. The start (Actual Start) is documented by a memo to file containing the minutes from the meeting.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Regions are not required to report a combined RI/FS start if a separate RI and FS are being conducted and have been reported. The combined RI/FS actual start date is entered into CERCLIS site-specifically. For a PRP-financed RI/FS, the RI/FS start date (Actual Start) and the CD start date (Actual Start), or, AOC, state order, or state decree or notice of intent to comply with a UAO actual completion date (Actual Complete) must be entered into CERCLIS; the RI start and enforcement dates should be the same date. Funds for RI/FS and RI/FS oversight are contained in the pipeline operations AOA. The Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator by designating these sites as “Superfund Alternative.” This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Combined RI/FS (CO)	Program Measure	F, TR, S, SA, SS, ST	Contract modification or work assignment/ task order; or IAG; or Cooperative Agreement	Signed by EPA CO; Signed by other federal agency (USACE or	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
				BUREC); Signed by the Regional Administrator or designee.	the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RI/FS (BD)	Program Measure	RP, MR	Administrative Order on Consent (AOC); or Notice of intent to comply with a UAO for a RP-lead RI/FS and the Response acts Pd; or Memo transmitting Consent Decree (CD) to HQ or DOJ.	Signed by Regional Administrator or delegate, Signed by designated regional official and the Response acts Pd signed by parties of PRP RI/FS, Signed by Regional Administrator transmitting the Consent Decree.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RI/FS (BD)	Program Measure	PS	State order or comparable enforcement document State enforcement Cooperative Agreement; SMOA; or Other state/EPA agreement.	Signed by all appropriate state officials and parties Signed by Regional Administrator, Signed by the appropriate state and regional official, Signed by the appropriate state and regional officials.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Combined RI/FS (CO)	Program Measure	EP	Memo containing the minutes from initial RI/FS scoping meeting.	Not specified.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

d. Treatability Studies

Definition:

Treatability studies are laboratory or field tests used to determine whether available technologies will effectively decontaminate a given matrix in order to develop feasible remedial alternatives.

Definition of Accomplishment:

Fund-financed (Including F-, EP-, S- or TR- lead) - The start date is the date of EPA=s written approval, as reflected in CERCLIS, of the treatability study work plan. The completion is the written approval of the report on the results of the treatability study.

PRP-financed (Including RP-, MR- or PS- lead) - The treatability study starts when EPA approves, in writing, the treatability study work plan submitted by the PRP. The completion is the approval of the report on the results of the treatability study.

PRP- financed from a Special Account (Including Special Account Financed Action performed by EPA (SA-lead), the State (SS-Lead), or Tribal Government (ST-lead) actions) - The treatability study starts when EPA approves, in writing, the treatability study work plan. The completion is the approval of the report on the results of the treatability study.

Changes in Definition FY 06/07 - FY 08/09:

None

Special Planning/Reporting Requirements:

Treatability study (Action Name = Treatability Studies) planned and actual start and completion dates are not required in CERCLIS. Treatability studies are funded as part of an ESI/RI, RI/FS, or RD. Dollars are not budgeted, planned, or obligated separately. This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Treatability Studies (TS)	Program Measure	F, S, TR, EP RP, MR, PS, SA, SS, ST	Start: EPA's written approval of Treatability study work plan. Complete: Written approval of report on results of treatability study.	Start: Not specified. Complete: Not specified.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

e. Start of Public Comment Period (Proposed Plan to Public) (NPL & Superfund Alternative)

Definition:

The FS or RI/FS report is released to the public when the contamination at the site has been characterized and alternatives for remediation have been evaluated.

Definition of Accomplishment:

The Start of Public Comment Period (Proposed Plan to Public) is accomplished at a NPL or Superfund Alternative site either (1) on the date the appropriate regional official signs a letter transmitting RI/FS reports and the proposed plan to the site repository for public review, or (2) when the first page of the approved proposed plan, which lists the dates the public comment period starts and ends, is included in the site file. This date must be recorded in CERCLIS as the actual start date (Actual Start) of the SubAction, Public Comment Period (Action Name = Feasibility Study or Combined RI/FS or PRP FS or PRP RI/FS and SubAction Name = Public Comment Period).

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Accomplishments are based on the first proposed plan released to the public for each FS or RI/FS, regardless of lead. Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator designating these sites as "Superfund Alternative." This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Feasibility Study (FS) or Combined RI/FS (CO) or PRP RI/FS (BD) SubAction Name = Public Comment Period (PB)	Program Measure	F, S, TR, SA, SS, ST, EP, RP, MR, PS,	Letter transmitting RI/FS reports and proposed plan 1 st page of approved proposed plan.	Signed by appropriate regional official Not specified.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

f. RI/FS Duration (NPL & Superfund Alternative)Definition:

The purpose of the RI/FS is to assess site conditions and evaluate alternatives to the extent necessary to select a remedy.

The RI/FS starts with the obligation of Fund monies; or the signature of an AOC, state order, or state decree for the RI or RI/FS; or the date the Regional Administrator signs the memorandum transmitting the CD to DOJ or HQ for RI or RI/FS; or the date the PRPs provide notice of intent to comply with a UAO; or the conduct of the RI/FS scoping meeting and culminates with the signature of the ROD.

The objective of this measure is to focus on good project management of critical portions of the traditional remedial pipeline and establish a methodology which accurately assesses program performance. Duration trends provide indicators of areas that require attention.

Only RI/FS projects that started post-SARA will be used for comparison and evaluation purposes.

Definition of Accomplishment:

This measure includes all RI/FS projects at an NPL or Superfund Alternative site that have a targeted completion date in FY 08/09. The RI/FS duration will be calculated based on the RI or Combined RI/FS Start and Decision Document Developed (ROD completion) definitions specified in this Manual. Regional performance in FY 08/09 will be compared to:

- The regional and national average duration of RI/FS projects completed in FY 06/07 or FY 07/08;
- The regional and national average duration of RI/FS projects completed in previous quarters of FY 08/09.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

CERCLIS will automatically look at actual RI or RI/FS start dates and actual ROD completion dates. HQ will perform the analysis of the average durations. Fund and PRP durations at NPL or Superfund Alternative sites will be tracked. Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator. RI/FS duration is a program measure.

g. Engineering Evaluation/Cost Analysis (EE/CA)Definition:

The EE/CA identifies objectives for a Non-Time Critical (NTC) response action, and includes an analysis of cost, effectiveness, and implementability of the various alternatives that may be used to satisfy these objectives.

Definition of Accomplishment:

The actual start date of an EE/CA is the date that the appropriate regional official signs the EE/CA Approval Memorandum. This information should be recorded in CERCLIS as the actual start date (Actual Start) of the EE/CA (Action Name = Engineering Eval/Cost Analysis). The actual completion date of an EE/CA is the date that the appropriate regional official signs the Action Memorandum. This information should be recorded as the actual completion date (Actual Complete) of the EE/CA (Action Name = Engineering Eval/Cost Analysis).

Changes in Definition FY 06/07 - FY 08/09:

None

Special Planning/Reporting Requirements:

EE/CAs are reported site-specifically in CERCLIS. Funds for EE/CAs are contained in the pipeline operations AOA. This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Engineering Eval/Cost Analysis (EE)	Program Measure	F, S, TR, SA, SS, ST, EP, RP, PS, MR, CG	Start: EE/CA Approval Memorandum. Complete: Action Memorandum.	Start: Signed by appropriate regional official. Complete: Signed by appropriate regional official.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

h. Decision Documents DevelopedDefinition:

A "Decision Document" is developed to document decisions or changes to decisions (at NPL, non-NPL, and Superfund Alternative sites) to:

- Perform an emergency, time-critical, or Non-Time Critical (NTC) removal; or
- Perform a remedial action.

Definition of Accomplishment:

Removal Decision Documents (Emergency, Time Critical, or NTC) - The date the On-Scene Coordinator (OSC), AA OSWER, or designated regional official signs the first or original Action Memorandum for each removal. Regions will not receive credit for subsequent Action Memos, (e.g., ceiling increases) at the same removal. The date of the signature is recorded in CERCLIS as the actual completion date (Actual Complete) of the SubAction, Approval of Action Memo or Removal Action Memo Document. To receive credit for the Action Memo, the region must enter the action, actual completion date, OU, and Five Year Review information. EPA HQ is now responsible for data entry of the following elements: media addressed, media name, selected alternative, response technology, remedy cost data, and institutional control information.

Remedial Action Decision Documents (ROD, ROD Amendment, ESD, or Other) - Response actions decision document are documented in Record of Decision (ROD), ROD Amendment, Explanation of Significant Difference (ESD), or other remedy changes such as a letter to the file. After a ROD is signed, new information may be generated that could affect the remedy selected. Three types of changes occur: ROD Amendment, Explanation of Significant Differences, and, Other Remedy Change. All of these documents need to be sent to the below HQ address within 5 (five) days after signing:

Terrence Ferguson (Decision Document Coordinator)
US EPA Headquarters (MC 5202P)
One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, VA 22202

ROD: The ROD documents the selected remedy, provides the basis for taking action, and documents compliance with statutory requirements. It is prepared after completion of public comment period on the FS and proposed plan for an early action (remedial authority) or long-term response action. The completion date for the ROD is the date the designated regional official or the AA OSWER signs the ROD at a NPL or Superfund Alternative site for each RA is the date recorded in CERCLIS. This date is reported in CERCLIS as the ROD (Action Name = Record of Decision) completion date (Actual Complete). To receive credit for the ROD, the region must enter the OU, the media addressed, the media name, the selected alternative, the response technology, remedy cost data, and institutional control information.

For state-lead RODs under CERCLA that result from an F, S, TR, EP lead FS or RI/FS; or a PS or MR-lead, PRP RI/FS or PRP FS where EPA concurs on the ROD should have a lead of SC. Accomplishments are reported as the date of the latest signature from EPA or the state, on the ROD at NPL or Superfund Alternative sites.

For state-lead RODs without EPA concurrence, the ROD should have a lead of 'SW'. The ROD will not be included in accomplishment reporting; however, the ROD date should be recorded in CERCLIS as the date the state signs the ROD.

ROD Amendments are Fundamental Changes to the ROD: When post-ROD remedy change involves a fundamental or appreciable change or changes in the scope, performance, and/or cost or may be a number of significant changes that together have the effect of a fundamental change, the change in remedy should be documented in a ROD Amendment. A fundamental change may involve: change in the primary treatment method (e.g., containment remedy to an excavation and treatment remedy. If, as a result of PRP negotiations, the remedy in the ROD is changed from incineration to bioremediation, this also represents a fundamental change. When such fundamental changes or amendments are made to a remedy, the ROD process (revised proposed plan, public comment period, public meeting, responsiveness summary, and amended ROD) should be repeated. The amended ROD must be placed in the AR and a copy must be mailed to the above HQ address. A fundamental change to the ROD should be recorded as a ROD amendment SubAction in CERCLIS (Action Name = Record of Decision and SubAction Name = ROD Amendment). The date the designated regional official or the AA OSWER signs the amended ROD at a NPL or Superfund Alternative site should be recorded in CERCLIS as the actual completion date (Actual Complete) of the ROD Amendment SubAction (Action Name = Record of Decision and SubAction Name = ROD Amendment). Regions must enter the actual completion date of the ROD Amendment along with the Alternative Name, Media Name, Media Type, Selected Response Actions, and cost data. ROD Amendments are tracked as an internal reporting measure.

Explanation of Significant Differences (ESDs) are Significant Changes to the ROD: When a post-ROD remedy change involves a portion of the remedy and does not fundamentally alter the overall cleanup approach it may generally be documented as an Explanation of Significant Differences (ESD). Examples of significant changes could include: biological treatment is use in lieu of air stripping for ex-situ treatment of ground water. A copy of the ESD is placed into the AR, and a copy needs to be mailed to the above address at HQ. The ESD is made available to the public for review. A formal public comment period, public meeting, and responsiveness summary are not required. While the ESD is being prepared and made available to the public, response activities should continue. An ESD is not a new ROD and should not be coded as such in CERCLIS. It should be entered as a SubAction to the ROD (Action Name = Record of Decision and SubAction Name = Explanation of Significant Dif). ESD data are entered in CERCLIS at the

time of ESD signature. The date the ESD at a NPL or Superfund Alternative site is signed by the designated regional official or the AA OSWER is reported as the actual completion date (Actual Complete) of the ESD SubAction (Action Name = Record of Decision and SubAction Name = Explanation of Significant Diff). Response action and cost data only need to be entered when they change. ESDs are tracked as an internal reporting measure.

Other Remedy Changes Document Non-Significant Remedy Changes: Non-significant remedy changes fall within the normal scope of changes occurring during the Remedial Design/Remedial Action (RD/RA) or limited RA. These changes typically result from value engineering. This may cause minor changes in the type/cost of materials, equipment facilities, services, and supplies. When such changes do not significantly affect the scope, performance, or cost of the remedy, they are considered minor or non-significant.

Other Remedy Changes should be documented in a Note to File or Memorandum to File, titled "Other Remedy Change." Copies of these documents shall be placed into the Administrative Record (AR), and need to be mailed to the above address at HQ. Since the document is placed into the AR, it is available for public review. A formal public comment period, public meeting and responsiveness summary are not needed. An Other Remedy Change is not a new ROD and should not be coded as such in CERCLIS. It should be entered as a SubAction to the ROD (Action Name = Record of Decision and SubAction Name = Other Remedy Change). Other Remedy Change data are entered into CERCLIS at the time the document is signed. The date the Other Remedy Change at a NPL or Superfund Alternative site is signed by the designated regional official or the AA OSWER is reported as the actual completion date (Actual Complete) of the Other Remedy Change SubAction (Action Name=Record of Decision and SubAction Name=Other Remedy Change). Response action and cost data only need to be entered when they change. Other Remedy Changes are tracked as an internal reporting measure.

RODs Requiring No Physical Construction: At some NPL sites, EPA may determine, through the Remedial Investigation/Feasibility Study (RI/FS) (or other means), that no physical construction is necessary to protect human health and the environment. Such a determination may be documented in no action/no further action RODs, including RODs that require only monitoring, and Limited Action RODs requiring monitored natural attenuation or institutional controls only.

These ROD events should be coded into CERCLIS as follows:

- Action Name = Record of Decision;
 - Alternative Name
 - Media Name
 - Media Type (Air, Ground Water, Leachate, Liquid Waste, Other, Residuals, Sediment, Sludge, Soil, Solid Waste, Surface Waste); and
 - Selected Response Actions
 - No Action RODs:
 - No Action
 - No Further Action
 - Monitoring
- Cost data should be entered as 0 (zero)
- Limited Action RODs:
 - Natural Attenuation
 - Institutional Controls (Access Restriction, Access Restriction-Guards, Deed Restriction, Drilling Restriction, Fishing Restriction, Institutional Controls Not Otherwise Specified (N.O.S.), Land Use Restriction, Monitoring, Recreational Restriction, Revegetation, Swimming Restriction, and Water Supply Use Restriction

These decisions will be tracked separately but will be reported on a combined basis.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

To receive credit for an Action Memo, the region must enter the following data into CERCLIS:

- the media addressed through the action (Media Type and Media Name),
- the Selected Response Actions,
- the response action cost data,
- the institutional control information, and
- the Five Year Review year review information

To receive credit for a ROD, ROD amendment, ESD or Other Remedy Changes the region must enter the following data into CERCLIS:

- Action/SubAction Name,
- Actual Completion Date, and

For a ROD, ROD amendment, ESD, or Other Remedy Change, EPA HQ is now responsible for entering the following data into CERCLIS:

- the name of the selected alternative (Alternative Name),
- the media addressed in the ROD (Media Type and Media Name),
- the Selected Response Actions (which include institutional controls where anticipated). If institutional controls are anticipated at the site, institutional control objectives need to be defined and entered into CERCLIS, and
- associated cost data that are listed in the decision document that may be any or all of the following costs (Capital Cost (must always be entered even if 0), Annual O&M Cost, Total O&M Cost, Present Worth Cost, O&M Duration, and Discount Rate)

CERCLIS will system generate the RI/FS or FS actual completion date if one does not already exist and a predecessor relationship was established between the RI/FS and the ROD.

Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator by designating these sites as "Superfund Alternative." This is a program measure.

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Record of Decision (RO)	Program Measure	F, FE, S, TR, SA, SS, ST, EP, RP, MR, PS	ROD.	Signed by designated regional official or the AA OSWER.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = ROD Amendment (JQ)	Program Measure	F, FE, S, TR, SA, SS, ST, EP, RP, MR, PS	Amended ROD.	Signed by designated regional official or AA OSWER at an NPL or Superfund Alternative site.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Record of Decision (RO): SubAction Name = Explanation of Significant Diff (EH)	Program Measure	F, FE, S, TR, SA, SS, ST, EP, RP, MR, PS	ESD.	Signed by regional official or the AA OSWER.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Record of Decision (RO) SubAction Name = Other Remedy Change (OT)	Program Measure	F, FE, S, TR, SA, SS, ST, EP, RP, MR, PS	Other Remedy Change.	Signed by designated regional official or the AA OSWER.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

i. Final Remedy Selected

Definition:

This measure will track the Final Remedy Selected measure at NPL sites. Final Remedy Selected decisions will also be tracked in CERCLIS for non-NPL sites and reported separately. However, since the Final Remedy Selected (NPL sites) provides support for the Construction Completion GPRA goal, which is also limited to GPRA sites. A Final Remedy Selected decision occurs when a final decision has taken place at a site (i.e. the final remedy has been selected at the last OU for a site). This can include the signature of the final ROD, ROD Amendment, or Removal Action Memorandum at a site. In general an Explanation of Significant Difference will not constitute a Final Remedy Selected since those documents a non-fundamental change to a remedy. Also, a partial deletion from the NPL can not be a Final Remedy Selected since it does not constitute a final decision for the entire site.

Definition of Accomplishment:

Credit under CERCLA for a Final Remedy Selected will be given when:

- Site has a Final ROD or ROD Amendment and no existing planned ROD, ROD Amendment, Removal Action Memorandum, RI/FS or EE/CA and the action is designated as the Final Remedy. This is reported in CERCLIS as a ROD (Action Name = Record of Decision) or ROD Amendment (Action Name = ROD Amendment) with the date the designated regional official or the AA OSWER signs the ROD (Actual Complete) and the action has been designated a Final Remedy (Qualifier = R); or
- Site has a Removal Action Memorandum and no existing planned ROD, RI/FS, or planned action memorandum and the action is designated as the Final Remedy. This is reported in CERCLIS as an Action Memorandum (Action Name = Action Memorandum) with the date the removal decision was completed (Actual Complete) and the action is designated a Final Remedy (Qualifier = R).

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

CERCLIS will automatically look for planned RODs, ROD Amendments, Removal Action Memoranda, RI/FSs and EE/CAs when a user assigns the Final Remedy Selected qualifier at a ROD, ROD Amendment or Action Memorandum. Final Remedy determinations for sites deleted from the NPL are part of the SNAP process. The system will not assign the Final Remedy for a deleted site if a Final Remedy determination has already been made at the site. As part of the development of the baseline for this measure, HQ worked with the Regions to evaluate Construction Completion sites to determine whether they constituted a Final Remedy Selected (as of 2003). There were a limited number of sites where additional remedy selection was envisioned and a Final Remedy Selected determination was not made. As of 2005, no further changes to the baseline number were to be made.

Once a site is designated as Final Remedy Selected at the end of year pull, that site cannot get credit for a change in status if it is subsequently determined that additional changes to the remedy are needed in the future. However, the database can track that decision document that constitutes the most up to date document reflecting the actual final remedy selected action, as opposed to the decision document for which credit for Final Remedy Selected accomplishment was recorded.

Data Quality:

Data Entry Timeliness Requirement

The Final Remedy Selected decision will be marked by the Region as a qualifier associated with a specific response measure decision document and operable unit. This qualifier may be selected for a planned action that is expected to be the Final Remedy for the site. The measure only includes sites for which the Final Remedy Selected qualifier is assigned to a completed action (one for which the user enters the actual completion date). It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the activity occurs. Once a site is designated as a Final Remedy Selected site, that designation cannot be removed from the site (although CERCLIS may track what the new decision is that will be the Final Remedy document) and the site cannot get credit for another Final Remedy Selected accomplishment in another year. (Generally, the quarterly pull occurs on the fifth business day following the end of each quarter or the 10th business day following the end of the fourth fiscal quarter.)

Accuracy Requirement

The final remedy determination is tracked to the signature date of the decision document that designates the remedy for the final OU at the site. The measure tracks the fiscal year in which the final remedy determination was made and associates the measure to the remedy decision document/action. The Final Remedy Selected measure at a site is locked to the year in which the Final Remedy was originally selected/designated. The system prevents users from changing the original Fiscal Year in which a final remedy selected determination was made, once the fiscal year has past. If a new decision/action is made at the site that supercedes the original Final Remedy Selected determination, the system prompts users to "move" the Final Remedy Selected qualifier to the new measure/action which becomes the new Final Remedy at the site. In these cases, the Region must document the reason that the remedy changed. If the Fiscal year of the original Final Remedy Selected action has passed, the measure counts the site in the original Fiscal Year of the determination. The site is not counted twice if the Final Remedy Selected qualifier is moved. Further, measures cannot be removed from CERCLIS after the end of year accomplishment pull from CERCLIS is determined.

Reports and Guidance

SCAP 15

j. Removal Starts - Please see Appendix F

Any SUPERFUND FINANCED Removals shall adhere to APPENDIX F, Removals.

Removal Completions - Please see Appendix F

k. Remedial Design (RD) Start (NPL & Superfund Alternative)

Definition:

The RD converts the remedy selected in the ROD into a final design document for the RA. The obligation of funds for design assistance or technical assistance does not constitute a RD start.

Pre-design activities will not be counted as an RD start.

Definition of Accomplishment:

Fund-Financed (Including F-, EP-, TR-, and S-lead actions) - A Fund-financed RD (Action Name = Remedial Design) at a NPL or Superfund Alternative site is started (Actual Start) when funds are obligated. An obligation is made when:

- The EPA CO signs the contract modification or work assignment/task order for the RD; or
- A Cooperative Agreement is signed by the Regional Administrator or his designee; or
- An IAG is signed by the other federal agency.

In those instances where design assistance is conducted prior to ROD signature, and there is not a new obligation of funds for a subsequent RD, the start of RD is defined as the written approval of the work plan to conduct these activities. If there is a new obligation of funds, the start of RD is defined as the date funds are obligated. When an RD has been prepared by other parties (e.g., water lines where the city already prepared plans and specifications) or plans developed for a similar remedy will be used, the RD actual start date is the same as the RA actual start date.

PRP-financed RD from a Special Account (including Special Account Financed Action performed by EPA (SA-lead) the State (SS-Lead), or Tribal Governments (ST-lead) actions) - A PRP-financed RD from a Special Account (Action Name = Remedial Design) at an NPL or Superfund Alternative site is started (Actual Start) when funds are obligated. An obligation is made when:

- The EPA CO signs the contract modification or work assignment/task order for the RD; or
- A Cooperative Agreement is signed by the Regional Administrator or his designee; or
- An IAG is signed by the other federal agency.

In those instances where design assistance is conducted prior to ROD signature, and there is not a new obligation of funds for a subsequent RD, the start of RD is defined as the written approval of the work plan to conduct these activities. If there is a new obligation of funds, the start of RD is defined as the date funds are obligated. When an RD has been prepared by other parties (e.g., water lines where the city already prepared plans and specifications) or plans developed for a similar remedy will be used, the RD actual start date is the same as the RA actual start date.

PRP-financed under federal enforcement (RP-lead) - The start (Actual Start) of an RP-lead RD (Action Name = PRP RD) at a NPL or Superfund Alternative site is credited on the date the earlier of the following actions takes place:

- The enforcement document under which the RD is to be conducted becomes effective;
 - For an Administrative Order on Consent (AOC), this is the date of signature of the AOC for RD by the Regional Administrator or his delegate, or the date of signature of an amendment to an existing AOC to include RD;
 - For a Unilateral Administrative Order (UAO), this is the date of the PRP's written notice of intent to comply with the UAO;
 - For a CD, this is the date the Regional Administrator signs the memorandum transmitting the CD to DOJ or HQ; or
- An official written notice to proceed is issued by EPA to the PRP.

PRP-financed under federal enforcement (MR-lead) - The start (Actual Start) of a MR-lead RD (Action Name = PRP RD) at an NPL or Superfund Alternative site is credited on the date the earlier of the following actions takes place:

- The enforcement document under which the RD is to be conducted becomes effective:
 - For an Administrative Order on Consent (AOC), this is the date of signature of the AOC for RD by the Regional Administrator or his delegate, or the date of signature of an amendment to an existing AOC to include RD;
 - For a CD, this is the date the Regional Administrator signs the memorandum transmitting the CD to DOJ or HQ; or
- An official written notice to proceed is issued by EPA to the PRP.

PRP-financed under State enforcement (PS-lead actions) - Credit will be given (Actual Start) for a PS-lead RD (Action Name = PRP RD) at a NPL or Superfund Alternative site based on the issuance or

effective date of a state order or other comparable state enforcement document for RD (or combined RD/RA). If the RD is covered by a pre-existing state order, credit will be based on the notice to proceed date.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

The actual start date (Actual Start) of the RD (Action Name = Remedial Design or PRP RD) must be entered into CERCLIS. Accomplishments are reported site-specifically. Funds for RDs are in the pipeline operations AOA. This is a program measure. Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator by designating these sites as "Superfund Alternative."

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Remedial Design (RD)	Program Measure	F, EP, TR, S, SA, SS, ST	Contract modification or work assignment/task order for the RD, Cooperative Agreement or IAG.	Signed by the EPA CO; or Signed by the Regional Administrator or his designee; or An IAG signed by the other federal agency.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RD (BE)	Program Measure	RP, MR	Official written notice from the EPA to the PRP or the enforcement document under which the RD is to be conducted becomes effective (this can be either the AOC, or an amendment to an existing AOC to include RD; or The PRP's written notice of intent to comply with the UAO; or Memo transmitting the CD to DOJ or HQ).	Official written notice from the EPA AOC signed by the Regional Administrator or his delegate for the RD PRP's written notice Signed by Regional Administrator.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RD (BE)	Program Measure	PS	State order or other comparable state enforcement document.	Signature and date on the enforcement document.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

I. RD Completion (NPL & Superfund Alternative)Definition:

The RD converts the remedy selected in the ROD into a final design document for RA.

Definition of Accomplishment:

A RD at an NPL or Superfund Alternative site is complete when:

- **Fund-financed (Including F-, EP-, TR-, and S-lead actions)** - EPA concurs with, in writing, the final design document.
- **PRP-financed under federal enforcement (Including MR- and RP-lead actions)** - EPA concurs with, in writing, the final design document.
- **PRP-financed under State enforcement (PS-lead actions)** - the state concurs with the final design document.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

The actual completion date (Actual Complete) of the RD (Action Name = Remedial Design or PRP RD) must be entered into CERCLIS. Accomplishments are reported site-specifically. This is a program measure. Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator by designating these sites as "Superfund Alternative." Regions are required to copy technical data from the ROD at completion of the RD. The regions are required to update any technical or cost data if there are any changes. This can be accessed through the Selected Remedy Summary screen.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Remedial Design (RD)	Program Measure	F, EP, TR, S, SA, SS, ST	Written EPA approval of the final design document.	Not specified	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RD (BE)	Program Measure	RP, MR	Written EPA approval of the final design document.	Not specified.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RD (BE)	Program Measure	PS	State approval of final design document.	Not Specified	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

m. Remedial Action (RA) Start (NPL & PRP-lead Superfund Alternative)

Definition:

Remedial Action - A Remedial Action (RA) is the actual construction or implementation phase of a Superfund site cleanup, as selected in the remedy decision document (e.g., ROD, ROD amendment, ESD), that follows remedial design. Fund-financed remedial actions (including RAs financed from a Special Account) can only be funded at sites that are final on the NPL. PRP-financed RAs (unless financed from a Special Account) may be performed at NPL and Superfund Alternative sites.

Limited Remedial Action - A Limited Remedial Action (Limited RA) is the implementation of a remedy decision document where the only action selected is Monitored Natural Attenuation and/or Institutional Controls. A Limited RA is distinguished from Remedial Action because the remedy typically requires no remedial design and is distinguished from a No Action/No Further Action ROD because the remedy includes at least some remedial action component. In the case of monitored natural attenuation, natural processes are used to attain cleanup goals, and the Limited RA may only consist of adding monitoring wells and a determination that the action is complete. For an institutional control only remedy, the Limited RA consists of ensuring the institutional controls are in place. To identify an RA as a Limited RA in CERCLIS, a Region should attach the Limited RA Critical Indicator to the RA action code (Action Name = Remedial Action or PRP RA).

Institutional Control Remedial Action - An institutional control remedial action is an anomaly-coded action used solely to fund the institutional control implementation (or oversight) component of a selected remedy where the remedial action for the selected remedy has already been completed. This action is distinguished from a limited remedial action, in which the selected remedy is monitored natural attenuation and/or institutional controls only. Because this action is associated with an existing completed remedial action, the Other Start and Completion anomaly code (RAA_CODE = "OA") should be used. Where the selected remedy includes physical construction as well as institutional controls, and the remedial action is not yet started or is underway, implementation of the institutional controls should be included in the remedial action and the anomaly code should not be used.

DISCLAIMER: The Remedial Action start is a program management accomplishment that does not signify "initiation of physical on-site construction" for purposes of calculating a cost recovery statute of limitations. The date found in the remedial action actual start column of a CERCLIS report is a programmatic measure only, and cannot be relied upon to create any rights, substantive or procedural, enforceable by any party in litigation with the United States. EPA reserves the right to change such data at any time without public notice.

Definition of Accomplishment:

The start date (Actual Start) of the RA, Limited RA, or Institutional Control Action (Action Name = Remedial action or PRP RA), as defined below, is entered into CERCLIS to record the start accomplishment.

Fund-financed (Including F-, EP-, TR-, and S-lead actions)

Remedial Action and Institutional Control Remedial Action

- A RA start at a final NPL site is the date a contract modification for the RA is signed by the EPA CO or the IAG is signed by the other federal agency or a Cooperative Agreement is awarded, and funds are obligated.
- A RA start at a final NPL site, which is a subsequent RA start under an existing IAG, is the date the amendment to the IAG to include the new work is approved.

Limited Remedial Action

- A Limited RA start at a final NPL site is the date a ROD selecting a limited remedial action is signed.

PRP- financed RA from a Special Account (including Special Account Financed Action performed by EPA (SA-lead), the State (SS-Lead), or Tribal Governments (ST-lead) actions)

The appropriate use of Special Account funds for remedial actions is provided in the "Guidance on Key Decision Points in Using Special Account Funds" dated September 28, 2001.

Remedial Action and Institutional Controls Remedial Action

- A RA start at a final NPL site is the date a contract modification for the RA is signed by the EPA CO or the IAG is signed by the other federal agency or a Cooperative Agreement is awarded, and funds are obligated
- A RA start at a final NPL site, which is a subsequent RA start under an existing IAG, is the date the amendment to the IAG to include the new work is approved.

Limited Remedial Action

- A Limited RA start at a final NPL site the date a ROD selecting a limited remedial action is signed.

PRP-financed under federal enforcement (MR- lead actions)

Remedial Action

- A RA start at a NPL or Superfund Alternative site is the date either one of the following occurs and has been recorded in CERCLIS:
 - If work is performed by the PRPs under the same CD as the RD, the RA start is the date EPA approves, in writing, the PRP RD document (RD completion); or
 - Where the Fund performed the RD or the RD was done under a settlement/order for RD only and the PRPs are doing the RA under the terms of a separate CD or judgment for RA only, the RA start date is one of the following that occurs first:
 - The date the Regional Administrator signs the memorandum transmitting the CD (Action Name = Consent Decree) to DOJ or HQ; or
 - The date the judgment (Action Name = Judicial/Civil Judgment) was signed by the federal judge; or
 - The date EPA approves, in writing, the final design document for the RD.

Institutional Control Remedial Action

- A RA start at a NPL or Superfund Alternative site is the date the earlier of the following actions takes place:
 - The date of signature of the AOC for RA by the Regional Administrator or his delegate, or the date of signature of an amendment to an existing AOC to include the RA; or
 - The date the Regional Administrator signs the memorandum transmitting the CD to DOJ or HQ; or
 - An official written notice to proceed is issued by EPA to the PRP.

Limited Remedial Action

- A Limited RA start at a NPL or Superfund Alternative site, under the terms of a CD or judgment for RA only, is the date either one of the following occurs and is recorded in CERCLIS:
 - The CD (Action Name = Consent Decree) is transmitted by the Regional Administrator to HQ or the DOJ; or
 - The date the judgment (Action Name = Judicial/Civil Judgment) was signed by the federal judge.

PRP-financed under federal enforcement (RP- lead actions)

Remedial Action

- A RA start at a NPL or Superfund Alternative site is the date either one of the following occurs and has been recorded in CERCLIS:
 - If work is performed by the PRPs under the same CD as the RD, the RA start is the date EPA approves, in writing, the PRP RD document; or
 - Where the Fund performed the RD or the RD was done under a settlement/order for RD and the PRPs are doing the RA under the terms of a separate CD, UAO (RP-lead RA only) or judgment for RA only, the RA start date (Actual Start) is one of the following that occurs first:
 - The date of the PRP's written notice of intent to comply with the UAO for the RP-lead RA (Action Name = Unilateral Admin Order and SubAction Name = PRPs Ntfy EPA, Intent to Comply); or
 - The date the Regional Administrator signs the memorandum transmitting the CD (Action Name = Consent Decree); or

- The date the judgment (Action Name = Judicial/Civil Judgment) was signed by the federal judge; or
- The date EPA approves, in writing, the final design document for the RD.

Institutional Control Remedial Action

- A RA start at a NPL or Superfund Alternative site is the date the earlier of the following actions takes place:
 - The date of signature of the AOC for RA by the Regional Administrator or his delegate, or the date of signature of an amendment to an existing AOC to include the RA;
 - The date the Regional Administrator signs the memorandum transmitting the CD to DOJ or HQ; or
 - An official written notice to proceed is issued by EPA to the PRP.

Limited Remedial Action

- A Limited RA start at a NPL or Superfund Alternative site, under the terms of a CD, UAO or judgment for RA only, is that date either one of the following occurs and is recorded in CERCLIS:
 - The date of the PRP's written notice of intent to comply with the UAO (Action Name = Unilateral Admin Order and SubAction Name = PRPs Ntfy EPA, Intent to Comply);
 - The date the Regional Administrator signs the memorandum transmitting the CD to DOJ or HQ; or
 - The date the judgment (Action Name = Judicial/Civil Judgment) was signed by the federal judge.

PRP-financed under State enforcement (PS-lead actions)

Remedial Action

- If the PRP is doing work under a state order or comparable enforcement document, and the NPL or Superfund Alternative site is covered by a state enforcement cooperative agreement or State Memorandum of Agreement (SMOA) with a schedule for remedial action work at the site, and EPA approved the ROD, the RA start is the date the state approves, in writing, the PRP RD document.

Institutional Control Remedial Action

- The RA start at a NPL or Superfund Alternative site is the issuance or effective date of a state order or other comparable state enforcement document for the RA. If the RA is covered by a preexisting order, the RA start date is the notice to proceed date.

Limited Remedial Action

- If the PRP is doing work under a state order or comparable enforcement document, and the NPL or Superfund Alternative site is covered by a state enforcement cooperative agreement or State Memorandum of Agreement (SMOA) with a schedule for remedial action work at the site, and EPA approved the ROD, the Limited RA start is the issuance or effective date of the enforcement instrument.

For both Fund- and PRP-financed actions - The region must identify the technologies to be constructed. To do this, the following information must be entered into CERCLIS: the Alternative Name, Media Name, Media Type, and the technology of the RA into the Response Action Type field (Selected Response Actions).

Changes in Definition FY 06/07 - FY 08/9:

Added a definition for Institutional Control Remedial Actions.

Special Planning/Reporting Requirements:

This is a program measure. The actual start date (Actual Start) of the RA (Action Name = Remedial Action or PRP RA), the critical indicator (Long-Term Action or Limited Remedial Action), and, for PRP-lead RAs, the appropriate enforcement information must be entered into CERCLIS. The Region must also enter the Alternative Name, Media Name, Media Type, and the remedial response actions (Selected Response Actions) associated with the RA into CERCLIS. Fund-financed RAs are planned on a site-and action-specific basis and are in the RA Site Allowance. Oversight of RP-lead RAs is planned on a site-and action-

specific basis and is funded through the Pipeline Operations Site Allowance. Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator by designating these sites as "Superfund Alternative."

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Remedial Action (RA)	Program Measure	F, EP, TR, S, SA, SS, ST	Contract modification for the RA or IAG.	RA signed by the EPA CO; or IAG signed by the other federal agency.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF)	Program Measure	MR	Written approval by the EPA of the PRP RD document, Memo transmitting the CD to DOJ or HQ The judgment, or written approval from the EPA of the final design document for the RD.	The date of written approval. Signed by the Regional Administrator Signed by the federal judge	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF)	Program Measure	RP	Written approval from EPA of the PRP RD document; PRP's written notice of intent to comply with UAO Memo transmitting the CD and judgment EPA written approval of the final design document.	The date of written approval. The date of written notice. Memo signed by the Regional Administrator; judgment signed by the federal judge 100% design approval by EPA	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF)	Program Measure	PS	Written approval from the state of the PRP RD document.	The date of written approval.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Remedial Action (RA): <i>Limited Remedial Action</i>	Program Measure	F, TR, S, SA, SS, ST	Signed ROD.	ROD signature date	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name	Program	RP	PRP's written notice	The date of written	It is good management practice to enter data

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
= PRP RA (BF): <i>Limited Remedial Action</i>	Measure		of intent to comply with UAO; Memo transmitting the CD to DOJ or HQ; A judgment.	notice. Signed by the Regional Administrator Signed by the federal judge.	regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF): <i>Limited Remedial Action</i>	Program Measure	MR	CD transmitted by the Regional Administrator to HQ or the DOJ; or Judgment.	The date of CD transmittal memo. Signed by the federal judge.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF): <i>Limited Remedial Action</i>	Program Measure	PS	Enforcement instrument.	The date of issuance or effective date.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Remedial Action (RA): <i>Institutional Control Remedial Action</i>		F, EP, TR, S, SA, SS, ST	Contract modification for the RA or IAG.	RA signed by the EPA CO; or IAG signed by the other federal agency.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF)): <i>Institutional Control Remedial Action</i>		MR	Official written notice from the EPA to the PRP or the enforcement document under which the RD is to be conducted becomes effective (this can be either the AOC , or an amendment to an existing AOC to include RD; or The PRP's written notice of intent to comply with the UAO; or Memo transmitting the CD to DOJ or HQ).	Official written notice from the EPA AOC signed by the Regional Administrator or his delegate for the RD PRP's written notice Signed by Regional Administrator.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF)): <i>Institutional</i>		RP	Official written notice from the EPA to the PRP or the enforcement document	Official written notice from the EPA AOC signed by the Regional	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
<i>Control Remedial Action</i>			under which the RD is to be conducted becomes effective (this can be either the AOC , or an amendment to an existing AOC to include RD; or The PRP's written notice of intent to comply with the UAO; or Memo transmitting the CD to DOJ or HQ).	Administrator or his delegate for the RD PRP's written notice Signed by Regional Administrator.	in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF) : <i>Institutional Control Remedial Action</i>		PS	State order or other comparable state enforcement document.	Signature and date on the enforcement document.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

n. RA Contract Award (NPL & PRP-lead Superfund Alternative)

Definition:

Award of RA contract is the date a contract for construction of the remedy is awarded.

Definition of Accomplishment:

Fund-financed (Including F-, TR-, and S-lead actions) - Date (recorded in CERCLIS as an Actual Complete) when the EPA, state, USACE, or BUREC awards (signs) a contract to initiate a Fund-financed RA.

If a RAC contractor is assigned RA responsibility, the award of RA contract at a final NPL site is defined as the date the RA subcontract is signed by the contractor. If an ERRS contractor will be performing the RA, award of RA contract is defined as the date (Actual Complete) the contract modification for the RA is signed by the EPA CO.

PRP-financed under federal enforcement (Including MR-, RP-, and PS-lead actions) - Date (recorded in CERCLIS as an Actual Complete) when the PRP awards a contract to initiate the RA at a NPL or Superfund Alternative site, as documented in a memorandum to the site file.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

The actual completion date (Actual Complete) must be placed in CERCLIS with the RA SubAction, Award of RA Contract (Action Name = Remedial Action or PRP RA and the SubAction Name = Award of Contract). This is a program measure. Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator by designating these sites as "Superfund Alternative."

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Remedial Action(RA)	Program Measure	F, TR, S	Contract, subcontract, or contract modification.	EPA, state, USACE, or BUREC signed contract. RA subcontract signed by the RAC contractor or the contract modification for the RA signed by the EPA CO.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF)	Program Measure	MR, RP, PS	Memo documenting PRP awarded contract.	The date of memo to the site file.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

o. Start of On-Site ConstructionDefinition:

This measure counts all remedial actions, limited remedial actions, or RODs for ground water monitoring at non-NPL, NPL, or Superfund Alternative sites.

Remedial Actions - A remedial action is the implementation of the remedy selected in the ROD. Remedial actions can only be funded at sites that are on the final NPL. This measure tracks each remedial action on-site construction at a site.

Limited Remedial Action - Limited remedial actions result from RODs which select monitored natural attenuation to attain cleanup goals and/or institutional controls as the only response actions. Limited actions are distinguished from no action/no further action RODs, such as those where ground water monitoring is the only response activity selected. Regions should enter monitored natural attenuation and institutional controls as remedial actions (Action Name = Remedial Action or PRP RA) in CERCLIS.

Ground water monitoring is defined as the collection and analysis of ground water samples as a result of a ROD that addresses ground water contamination at a site or operable unit. The purpose of the ground water monitoring is to ensure that ROD assumptions regarding no action on the ground water are correct rather than to verify performance of a ground water restoration or containment remedy. If the ROD specifies that ground water monitoring is the only activity that will be implemented during an operable unit ground water cleanup, then it is a no action or no further action ROD. For this type of activity, regions should enter a ground water monitoring activity/action: Action Name = Grndwtr Monitor (Post-ROD) into CERCLIS.

Definition of Accomplishment:

Remedial Action (RA On-Site Construction) - A site is addressed through a remedial action when the EPA, RAC, the USACE, state or PRP, or their contractors have begun on-site construction work at a site for the remedial action remedy selected in the ROD.

- **Fund-financed (Including F-, TR-, and S- lead actions)** - EPA, the state or their contractors have begun work for on-site construction of the remedy at a site on the final NPL. A memo to file documenting that the contractor has mobilized and began substantial and continuous physical on-site remedial action is required. This date is entered into CERCLIS as the RA On-Site Construction SubAction (Action Name = Remedial Action and SubAction Name = RA On-Site Construction Start) actual completion date (Actual Complete).

- **PRP-financed under federal enforcement (Including RP- and MR- lead actions)** - The PRPs or their contractors have begun work at a NPL or Superfund Alternative site for on-site construction of the remedy. The date of on-site construction must be documented in a memorandum to the site file stating when the contractor began substantial and continuous physical on-site remedial action. A copy of a report of start up from the contracting party is also acceptable. The date of on-site construction must be entered into CERCLIS as the RA On-Site Construction SubAction (Action Name = PRP RA and SubAction Name = RA On-Site Construction Start) actual completion date (Actual Complete).

In addition, to receive credit under this measure, the PRPs must be in compliance with a UAO, or an enforcement instrument signed by EPA and the PRPs, or a judgment signed by a federal judge. The following information must be entered into CERCLIS for the enforcement instrument:

- The date (Actual Complete) the PRPs provide notice of intent to comply (Action Name = PRP Notify EPA of Intent to Comply) with a UAO for the RP-lead RA signed (Actual Complete) by the designated regional official (Action Name = Unilateral Admin Order), and the Response Acts Pd by Parties of "PRP RA" or
- The date the CD (Action Name = Consent Decree) was signed by the PRPs, the designated regional official, and the federal judge (Actual Complete), and the Response Acts Pd by Parties of "PRP RA"; or
- The date a judgment (Action Name = Judicial/Civil Judgment) was signed by the federal judge (Actual Complete), and the Response Acts Pd by Parties of "PRP RA".
- **PRP-financed under State enforcement (PS-lead actions)** - The PRPs or their contractors have begun work at a NPL or Superfund Alternative site for on-site construction of the remedy. The date of on-site construction must be documented in a memorandum to the site file stating when the contractor began substantial and continuous physical on-site remedial action. A copy of a report of start up from the contracting party is also acceptable. The date of on-site construction must be entered into CERCLIS as the RA On-Site Construction SubAction (Action Name = PRP RA and SubAction Name = RA On-Site Construction Start) actual completion date (Actual Complete). In addition, to receive credit under this measure, the PRPs must be working under a state enforcement instrument.

Limited Remedial Action - Credit for the start of a Limited Action RA is given when:

- **Fund-financed (Including F-, TR-, and S-lead actions)** - The ROD selecting a limited remedial action is signed at a site on the final NPL. The actual start date (Actual Start) is entered into CERCLIS with the RA (Action Name = Remedial Action).
- **PRP-financed under federal enforcement (Including MR- and RP- lead actions)** - When the PRPs are doing the Limited Action RA at a NPL or Superfund Alternative site under the terms of a CD, UAO or judgment for Limited Action RA only, the RA start date (Actual Start) is the same as the date (Action Complete) of the PRP's written notice of intent to comply with the UAO for the RP-lead RA (Action Name = Unilateral Admin Order and SubAction Name = PRPs Ntfy EPA, Intent to Comply); or the date the Regional Administrator signs the memorandum transmitting the CD (Action Name = Consent Decree) to DOJ or HQ as recorded in CERCLIS as the actual CD (Action Name = Consent Decree) start (Actual Start); or the date a judgment (Action Name = Judicial/Civil Judgment) is signed by the federal judge (Actual Complete). Where the PRP is in significant non-compliance with the UAO for the RP-lead RA, credit will be withdrawn.
- **PRP-financed under State enforcement (PS-lead)** - When the PRPs are doing the Limited Action RA (Action Name = PRP RA) at a NPL or Superfund Alternative site under a state order or comparable enforcement document, and the site is covered by a state cooperative agreement or SMOA with a schedule for work at the site, and EPA approved the ROD, the Limited Action RA start (Actual Start) is the issuance or effective date of the enforcement instrument;

Ground Water Monitoring (as the only activity taken at the site or ground water operable unit) - Credit is given for a ground water monitoring activity Action Name = Grndwtr Monitor (Post-ROD) start (Actual Start) when:

- **Fund-financed (Including F-, TR-, and S- lead actions)** - Fund-financed Ground Water Monitoring starts at a site on the final NPL when this date is documented in a memo to the file.

- ***PRP-financed under federal enforcement (Including MR- and RP- lead actions)*** - PRP-financed ground water monitoring under federal enforcement starts at a NPL or Superfund Alternative site when this date is documented in a memo to the file.
- ***PRP-financed under State enforcement (PS-lead actions)*** - PRP-financed ground water monitoring under state enforcement starts at a NPL or Superfund Alternative site when a state order or comparable state enforcement document is signed by the last state official.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

RAs, limited remedial actions, and ground water monitoring (post-ROD) starts will be tracked separately for management purposes. Ground water monitoring and oversight of ground water monitoring is covered under the Pipeline Operations AOA. The date of RA on-site construction (Action Name = Remedial Action and SubAction Name = RA On-site Construction Start) will be used for purposes of establishing the Statute of Limitation (SOL) determination. It is also used as the trigger date for a statutory Five Year Review, if applicable. The Five Year Review planned completion date is set for five years after the RA On-Site Construction Start planned start date. The Five Year Review planned completion date will be greyed out and uneditable once the actual start date for the RA On-Site Construction Start is entered. This is a program measure.

Data Entry Timeliness Requirements:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Remedial Action (RA): SubAction name = RA On-Site Construction (RG)	Program Measure	F, TR, S	Memo	The date of memo to the site file.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF): SubAction name = RA On-Site Construction (RG)	Program Measure	RP, MR	Memo or a copy of a report of start up from the contracting party	Memo to site file.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP RA (BF): SubAction name = RA On-Site Construction (RG)	Program Measure	PS	Memo or a copy of a report of start up from the contracting party. State enforcement instrument	Memo to site file.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = <i>Limited Remedial Action (RA)</i> SubAction name = RA On-Site Construction (RG)	Program Measure	F, TR, S	Signed ROD.	The date of the ROD.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Unilateral Admin Order (UA) Consent Decree (CD) Judicial/Civil Judgment (JG)	Program Measure	MR, RP	PRP's written notice of intent to comply with UAO; or Memo transmitting the CD to DOJ or HQ; or Judgment signed by the federal judge.	The date of PRPs written notice. Signed by the Regional Administrator Signed by the federal judge.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = <i>Limited PRP RA (BF)</i>	Program Measure	PS	State order or comparable enforcement document and a state cooperative agreement of MOA EPA approved ROD Enforcement instrument.	The date of issuance or effective date of the enforcement instrument. Not specified	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Grndwtr Monitor (Post-ROD) (GM)	Program Measure	F, TR, S	Start: Signed ROD and Memo.	Start: The date of memo to file documenting first sample or new well. Memo to site file.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Grndwtr Monitor (Post-ROD) (GM)	Program Measure	MR, RP	Start: Signed ROD and Memo.	Start: The date of memo to file documenting first sample or new well. Memo to site file.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Grndwtr Action name = Monitor (Post-ROD) (GM)	Program Measure	PS	Start: State order or comparable state enforcement document.	Start: Signed by last state official	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

p. Operational and Functional (O&F)

Definition:

O&F activities are conducted after physical construction of the remedy is complete to ensure that it is functioning properly and operating as designed. A remedy is determined to be operational and functional either one year after construction is complete, or when EPA and the state concur that the remedy is functioning properly and is performing as designed (whichever is earlier). EPA may grant extensions to the one-year period, as appropriate. O&F activities occur during the last year of the RA activities, and generally guide the schedule for transferring O&M responsibilities to States for fund-financed remedies.

O&F determinations are only made for those remedies that have an operation and maintenance (O&M), Long-term response action (LTRA), or PRP Long-term response action (PRP LR) component. All leads except Federal facilities may have an O&F determination. Monitored natural attenuation also has a simplified O&F determination. EPA is responsible for the O&F determination (with concurrence from the appropriate parties); therefore all O&F subactions are given a Fund-financed lead code. Upon O&F completion, the remedy moves into LTRA, PRP LR, or O&M.

Definition of Accomplishment:

O&F activities are completed when the appropriate parties (e.g., state, PRP) concur that the remedy is operational and functional, and the completion (Actual Completion Date) of O&F (SubAction Name = Operational and Functional) is documented by a letter from EPA to the appropriate parties. The O&F completion date directly corresponds to the start date for the LTRA, PRP LR or O&M action that follows.

Changes in Definition FY 06/07 - FY 08/09:

The Interim or Final RA Report is only used to document RA completion, and should no longer be used to document O&F determinations due to potential delays in preparing RA reports. O&F completions should be documented by a letter from EPA to the appropriate parties, independent from the RA report. This will ensure timely transfer of O&M responsibilities to States at fund-financed remedies.

Special Planning/Reporting Requirements:

The completion (Actual Complete) of O&F (SubAction Name = Operational and Functional) are reported site and OU specifically in CERCLIS. This is a program measure. As a subaction, O&F does not receive funding.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
SubAction Name = Operational	Program Measure	F	Letter to the interested parties.	Signed by the designated regional official within 1 year of	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
and Functional (VM)				remedy construction, unless an extension has been granted	be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

q. Completion of a Response Action (NPL & PRP-lead Superfund Alternative)

Definition:

Remedial Action - A Remedial Action (RA) is the actual construction or implementation phase of a Superfund site cleanup, as selected in the remedy decision document (e.g., ROD, ROD amendment, ESD), that follows remedial design. Fund-financed remedial actions (including RAs financed from a Special Account) can only be funded at sites that are final on the NPL. PRP-financed RAs (unless financed from a Special Account) may be performed at NPL and Superfund Alternative sites.

Limited Remedial Action - A Limited Remedial Action (Limited RA) is the implementation of a remedy decision document where the only action selected is Monitored Natural Attenuation and/or Institutional Controls. A Limited RA is distinguished from Remedial Action because the remedy typically requires no remedial design and is distinguished from a No Action/No Further Action ROD because the remedy includes at least some remedial action component. In the case of monitored natural attenuation, natural processes are used to attain cleanup goals, and the Limited RA may only consist of adding monitoring wells and a determination that the action is complete. For an institutional control only remedy, the Limited RA consists of ensuring the institutional controls are in place. To identify an RA as a Limited RA in CERCLIS, a Region should attach the Limited RA Critical Indicator to the RA action code (Action Name = Remedial Action or PRP RA).

Institutional Control Remedial Action - An institutional control remedial action is an anomaly-coded action used solely to fund the institutional control implementation (or oversight) component of a selected remedy where the remedial action for the selected remedy has already been completed. This action is distinguished from a limited remedial action, in which the selected remedy is monitored natural attenuation and/or institutional controls only. Because this action is associated with an existing completed remedial action, the Other Start and Completion anomaly code (RAA_CODE = "OA") should be used. Where the selected remedy includes physical construction as well as institutional controls, and the remedial action has not yet started or is underway, implementation of the institutional controls should be included in the remedial action and the anomaly code should not be used.

Ground Water Monitoring (Post- ROD) - Ground Water Monitoring (Post-ROD) is the collection and analysis of ground water samples as a result of a Record of Decision that addresses ground water contamination at a site or operable unit. The purpose of the ground water monitoring is to ensure that ROD assumptions regarding no action on the ground water are correct rather than to verify performance of a ground water restoration or containment remedy.

Definition of Accomplishment:

The completion date (Actual Completion) of the RA, Limited RA, or Institutional Control Action (Action Name = Remedial action or PRP RA), as defined below, is entered into CERCLIS to record the complete accomplishment.

The completion date (Actual Completion) of the Ground Water Monitoring (Post-ROD) Action (Action Name = Grndwtr Monitor (Post-ROD)), as defined below, is entered into CERCLIS to record the complete accomplishment.

Remedial Action Completion**Remedial Action and Limited Remedial Action**

- A Fund-financed RA completion at a final NPL site or a PRP-lead RA completion at a NPL or Superfund Alternative site is the date the designated regional official approves the Interim or Final Remedial Action Report.
- An action qualifier must be entered into CERCLIS indicating the RA was completed via an Interim or Final RA Report (Action Qualifier = Interim RA or Final RA).

Examples of Remedial action completions and criteria for EPA approval of the Interim and Final RA Reports are in Chapter 2 of the *Closeout Procedures for National Priorities List Sites* (OSWER 9320.2-09A-P).

Institutional Control Remedial Action

- A Fund-financed RA completion at a final NPL site or a PRP-lead RA completion at a NPL or Superfund Alternative site is the date it is determined, through the appropriate institutional control documentation vehicle designated in the ROD (e.g. deed restriction, well drilling restriction, ground water use restriction) is implemented, as appropriate.

Ground Water Monitoring (Post-ROD) Completion

- A Fund-financed ground water monitoring (post-ROD) completion at a final NPL site or a PRP-lead ground water monitoring (post-ROD) completion at a NPL or Superfund Alternative site is the date EPA determines, through a Final Superfund Close-Out Report or memorandum signed by the appropriate regional official, that ground water monitoring is no longer necessary.

Changes in Definition FY 06/07 - FY 08/09:

Language has been updated to include Institutional Control Remedial Actions.

Special Planning/Reporting Requirements:

Remedial action, limited remedial action, institutional control remedial action, and ground water monitoring (post-ROD) completions will be tracked separately but accomplishments, with the anomaly-coded remedial actions, will be reported on a combined basis. Regions must enter an action qualifier into CERCLIS indicating the RA was completed via an Interim or Final RA Report for Remedial Action and Limited Remedial Actions.

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Remedial Action (RA) or PRP RA (BF)	Program Measure	F, EP, TR, S, SA, SS, ST, MR, RP, PS	Written approval of the Interim or Final Remedial Action Report.	Written approval from the designated regional official of the Interim or Final Remedial Action Report.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Remedial Action (RA) or PRP RA (BF): <i>Limited Remedial Action</i>	Program Measure	F, EP, TR, S, SA, SS, ST, MR, RP, PS	Interim or Final RA Report.	Signed by the designated regional official	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
					FYQ4.)
Action name = Remedial Action (RA) or PRP RA (BF): <i>Institutional Control Remedial Action</i>		F, EP, TR, S, SA, SS, ST, MR, RP, PS	Signature of the institutional control documentation vehicle designated in the Record of Decision	Signature on the institutional control documentation	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = Grndwtr Monitor (Post-ROD) (GM)		F, S, TR, MR, RP, PS	Final Superfund Close-Out Report, Five Year Review report, memorandum.	Signed by the Regional Administrator, with HQ concurrence. Not specified Signed by appropriate regional official.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

r. NPL Site Construction Completions

Definition:

Construction at an NPL site is considered complete when physical construction is complete for the entire site as a result of one or several removal or remedial actions and a Preliminary or Final Close Out Report (PCOR or FCOR) has been signed by the designated regional official and concurred with by HQ. The report must address construction activities for the entire site. There is only one NPL site construction completion per NPL site. For more detailed information, see OSWER Directive 9320.2-09A-P, "Close Out Procedures for National Priorities List Sites."

Definition of Accomplishment:

The following table explains coding and accomplishment requirements.

NPL SITE CONSTRUCTION COMPLETION

Examples of last OU or activity	When Construction is Complete	Coding Requirements
1) Excavation and off-site disposal of contamination, 2) On-site treatment of wastes (except for ground water restoration, bioremediation or soil vapor extraction), or 3) Containment remedies.	Pre-final inspection has been conducted, only minor punch list items remain, and the designated regional official has signed the Preliminary or Final Close-Out Report (PCOR or FCOR).	The region enters completion date of the report into CERCLIS as the actual completion date (Actual Complete) of the Preliminary Close-Out Report Action Name = Prelim Close-Out Rep Prepared, or the actual completion date (Actual Complete) of the Final Close-Out Report Action Name = Close Out Report AND HQ enters the Construction Completion indicator into CERCLIS. This action constitutes HQ concurrence with the PCOR or FCOR documentation.

Examples of last OU or activity	When Construction is Complete	Coding Requirements
In-situ bioremediation, ex-situ bioremediation, or soil vapor extraction.	Treatment unit has been constructed, is operating as designed, studies show that technology will achieve cleanup goals, and the designated regional official has signed the PCOR.	
Ground water and surface water restoration remedies that involve active treatment to reduce contaminant concentrations to meet cleanup goals.	Remedy is documented in final ROD (interim action RODs must be finalized), physical construction of the remedy is complete, and the designated regional official has signed the PCOR.	
Ground water and surface water restoration remedies that involve monitored natural attenuation to reduce contaminant concentrations to meet cleanup goals	Remedy is documented in final ROD (interim action RODs must be finalized), any necessary physical construction is complete, and the designated regional official has signed the PCOR.	
RODs with contingency remedies	Physical construction of the remedy is complete, a pre-final inspection has been conducted, only minor punch list items remain, the PCOR or FCOR demonstrates that use of the contingency is not anticipated, and the designated regional official has signed the PCOR or FCOR.	
Sites deleted from the NPL prior to reaching Construction Completion.	When (1) EPA determines that all physical construction is complete under all statutory authorities, and (2) all other applicable construction completion policy criteria have been satisfied.	Consistent with requirements for final NPL sites.
Sites requiring no remedial action or no further remedial action in the last OU. This includes ground water monitoring if that is the only activity specified in the ROD.	No action or no further action ROD has been signed, and the designated regional official has signed the PCOR or FCOR. No Action RODs will not be accepted for Construction Completion.	The region enters the completion date of the report into CERCLIS as the actual completion date (Actual Complete) of the PCOR (Action Name = Prelim Close-Out Report Prepared) or the actual completion date (Actual Complete) of the Final Close-Out Report (Action Name = Close Out Report). AND HQ enters the Construction Completion indicator into CERCLIS. This action constitutes HQ concurrence with the PCOR or FCOR documentation.
Institutional controls as the only remedy in the ROD.	The PCOR indicates that the institutional controls are in the schedule for site completion, and the designated regional official has signed the PCOR. If institutional controls have been implemented, region can go directly to FCOR.	

Examples of last OU or activity	When Construction is Complete	Coding Requirements
NPL site entirely addressed through removal actions. For removals with institutional controls, see above.	Fund-Financed: Contractor has demobilized, as recorded in POLREP. PRP-Financed: Region certifies that PRPs or their contractor have completed the removal specified in the Action Memorandum and fully met the terms of the AO, CD or judgment. Both Fund- and PRP-Financed: The designated regional official has signed the FCOR. The FCOR must demonstrate that the removal process included an EE/CA, which complies substantially with NCP requirements.	The region enters the following into CERCLIS: The removal (Action Name = Removal Action or PRP Removal) actual completion date (Actual Complete) as reported in the POLREP; and the Qualifier that indicates that the site is Cleaned Up; and the actual completion date (Actual Complete) of the Final Close-Out Report (Action Name = Close Out Report); AND HQ enters the Construction Completion indicator into CERCLIS. This action constitutes concurrence with the FCOR documentation.
If an FCOR can be prepared initially, then the site can achieve the NPL Construction Completion and NPL Site Completion measure simultaneously. EPA is responsible for documenting construction completion; therefore all PCOR and FCOR actions are given a Fund-financed lead code.		

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Regions will not receive credit for a NPL Site Construction Completion until the actual completion date of the Preliminary or Final Close-Out Report is entered into CERCLIS, the necessary documentation is submitted to HQ, and HQ enters the construction completion indicator into CERCLIS. Regions identify sites to meet the goal prior to the start of the FY. Regions may receive credit under this measure and the NPL Site Completion measure as a result of the same remedial action or removal action. This is a GPRA annual performance goal.

Policy Five Year Review planned completion date is set for five years after the PCOR or FCOR planned completion date. The Five Year Review planned completion date will be greyed out once the actual completion date of the PCOR or FCOR is entered.

Data QualityData Entry Timeliness Requirement

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = Prelim Close-Out Rep Prepared (CM) or Close Out Report (CQ)	GPRA Annual Performance Goal	F	Preliminary or Final Close-Out Report (PCOR or FCOR) and/or;	Signed by designated regional official and concurred with by HQ.	Within five working days, but no later than ten working days.
Action Name = Removal Action (RV)	GPRA Annual Performance Goal	F, S, TR, SA, SS, ST	POLREP FCOR	Final POLREP Signed by the Regional Administrator, with HQ concurrence.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action Name =	GPRA	MR, RP,	Action	Not specified Signed by	It is good management practice to

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
PRP Removal (BB)	Annual Performance Goal	PS	Memorandum FCOR	the Regional Administrator, with HQ concurrence.	enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

Accuracy Requirement

The completion date of the action designating the Construction Completion shall match the final signature date of the corresponding document in the Superfund Document Management System.

Reports and Guidance

- SCAP-14
- SCAP-15
- DQO Timeliness Audit Report - Number of Construction Completions (run quarterly)

s. Long-Term Response Action (LTRA and PRP LR) (NPL & PRP-lead Superfund Alternative)

Definition:

LTRA at a final NPL site is defined as the Fund-financed, or PRP-financed from a special account, operation of ground water and surface water restoration actions (including monitored natural attenuation) involving treatment or other measures to restore ground- or surface-water quality to a level that assures protection of human health and the environment. The period of LTRA is administratively complete when:

- Measures restore ground- or surface-water quality to a level that assures protection of human health and the environment; or
- Measures restore ground- or surface-water to such a point that the reductions in contaminant concentrations are no longer significant; or
- Ten years have elapsed; whichever is earliest.

PRP LR (PRP long-term response) is a specific type of O&M for those remedies with operation of ground water and surface-water restoration actions (including monitored natural attenuation) involving treatment or other measures to restore ground- or surface-water quality to a level that assures protection of human health and the environment. The period of PRP LR is administratively complete when:

- Measures restore ground- or surface-water quality to a level that assures protection of human health and the environment; or
- Measures restore ground- or surface-water to such a point that the reductions in contaminant concentrations are no longer significant; whichever is earliest.

Note that LTRA and PRP LR do not apply to other remedies that require a long time to achieve cleanup goals, such as bioremediation or soil vapor extraction. LTRA and PRP LR also do not apply to ground water or surface water containment measures, ground water monitoring, ground water or surface water measures initiated for the primary purpose of providing a drinking water supply.

The appropriate use of Special Account funds is provided in the "Consolidated Guidance on the Establishment, Management and Use of CERCLA Special Accounts" dated October 4, 2002.

Definition of Accomplishment:

Fund-financed LTRA, PRP-financed from a Special Account (Including Special Account Financed Action performed by EPA (SA-lead), the State (SS-lead), or Tribal Government (ST-lead) actions) or PRP LR

Start: LTRA at a final NPL site or PRP-LR at a NPL or Superfund Alternative site (Action Name = Long Term Response or PRP LR) begins (Actual Start Date) on the date the remedy is determined to be O&F. Note that RA completion may occur later than LTRA start because the Interim RA Report is to be submitted to the region for approval within 90 days of the O&F determination.

Fund-financed LTRA or PRP-financed from a Special Account Completion: LTRA at a final NPL site is complete (Actual Complete Date) ten years after it begins, when cleanup goals are achieved as documented in the final RA Report, or when a technical impracticability determination is made, whichever is earlier. LTRA transitions to O&M if cleanup goals have not been achieved within the ten-year period.

PRP LR Completion: PRP LR at a NPL or Superfund Alternative site is complete (Actual Complete Date) when cleanup goals are achieved as documented in the final RA Report or when a technical impracticability determination is made, whichever is earlier.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

LTRA and PRP LR are planned on a site-specific basis (Action Name = Long-term Response or PRP LR) in CERCLIS and are used for resource allocation purposes only. Funds for LTRA are issued site-specifically in the RA AOA. Funds for oversight of the PRP LR are contained in the pipeline operations AOA.

Superfund Alternative sites should be identified in CERCLIS using the special initiatives indicator by designating these sites as "Superfund Alternative."

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Long Term Response (LR)	Program Measure	F, S, TR, SA, SS, ST	Start Letter documenting O&F completion Complete Letter to the state confirming LTRA transfer; or Final RA Report; or Technical impracticability determination	Start Written approval from the designated regional official. Complete Signed by the appropriate regional official. Date is 10 years after LTRA began; or Written approval from the designated regional official (Branch Chief or above). Date is when cleanup goals are achieved; or Written approval from the designated regional official.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action name = PRP LR (ME)	Program Measure	RP, MR, PS, SR	Start Letter documenting O&F completion Complete Final RA Report; or Technical impracticability determination	Start Written approval from the designated regional official. Complete Written approval from the designated regional official (Branch Chief or above). Date is when cleanup goals are achieved; or Written approval from the designated regional official.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

t. Operation and Maintenance (O&M)Definition:

O&M are the activities required to maintain the effectiveness or the integrity of the remedy, and, in the case of Fund-financed or PRP-financed from a special account measures to restore ground- or surface- waters, continued operation of such measures beyond the LTRA period until cleanup goals are achieved. Except for Fund-financed or PRP-financed from a special account ground- or surface- water restoration actions covered under Section 300.435(f)(4) of the NCP, O&M measures are initiated after the remedy has achieved the remedial action objectives and remediation goals in the ROD, and is determined to be O&F (see definition of O&F).

Depending on the remedy that was implemented at the site/OU, O&M may not be required, may only be required for a defined timeframe, or may be required to be performed indefinitely. Examples of remedies where O&M may have an indefinite period of performance are sites where waste is contained on-site and the integrity of the cap must be maintained or sites where institutional controls must be maintained. In some instances, O&M may be complete when the ground- or surface- water restoration goals are met. The state or PRP is totally responsible for O&M.

Ground water and surface water restoration measures, including monitored natural attenuation conducted by the PRPs, are technically defined as O&M. However, to better track these types of restoration remedies, regions should use PRP LR to indicate that these activities are being performed at the site.

The appropriate use of Special Account funds is provided in the “Consolidated Guidance on the Establishment, Management and Use of CERCLA Special Accounts” dated October 4, 2002.

Definition of Accomplishment:

O&M Action Name = Operations and Maintenance starts when the state or PRPs assume responsibility for all activities necessary to operate and/or maintain the long-term effectiveness or integrity of the actions selected in the ROD. O&M starts (Actual Start Date) on the date the remedy is declared O&F. Note that RA completion may occur later than O&M start because the Final RA Report is to be submitted to the region for approval within 90 days of the O&F determination.

For OUs where LTRA is required (either Fund-financed or PRP-financed through a Special Account), O&M (Action Name = Operation and Maintenance) begins when LTRA is complete (see Definition of Long-Term Response Action (LTRA)).

Where appropriate, the completion of O&M is defined as the date (Actual Complete) the performance standards or conditions specified in the Cooperative Agreement that provides funds for the RA, Superfund State Contract (SSC), or CD signed by EPA, the PRPs and federal judge have been met with respect to O&M. If O&M must be conducted indefinitely, regions should not enter an actual completion date.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

This is a program measure. O&M is planned site-specifically (Action Name = Operation and Maintenance) in CERCLIS and is used for resource allocation purposes only. Funds for oversight of O&M are contained in the pipeline operations AOA and/or a site specific special account. If O&M is not required, regions should not enter the action into CERCLIS. Where O&M must be conducted indefinitely, regions should not enter a planned or actual completion date for the O&M action.

If the only O&M activities being conducted by the PRPs at the site are ground water or surface water restoration, including monitored natural attenuation, regions should use the ‘PRP LR’ Action instead of the ‘Operations and Maintenance’ Action. In this situation, regions should not enter both Actions.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = Operations and Maintenance (OM) Start	Program Measure	RP, PS, MR, SA, SS, ST, SR, SN	Letter documenting O&F completion Letter to the state confirming LTRA transfer	Start: Signed by the designated regional official. Signed by the appropriate regional official. Date is 10 years after LTRA began.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

u. Cleanup Goals AchievedDefinition:

This measure is used to indicate when cleanup goals are achieved for ground water and surface water restoration remedies, including monitored natural attenuation. It tracks achievement of cleanup goals for these remedies because they were not achieved at Remedial Action completion.

Definition of Accomplishment:

Cleanup goals are achieved when the designated regional official (Branch Chief or above) approves in writing the Final Remedial Action Report for a ground water or surface water restoration remedy. This report should update information previously prepared in the Interim Remedial Action Report. For more detailed information, see OSWER Directive 9320.2-09A-P, "Close Out Procedures for National Priorities List Sites."

Changes in Definition FY 06/07 - FY 08/09:

None

Special Planning/Reporting Requirements:

Cleanup Goals Achieved is planned on a site-specific basis (Action Name = LTRA or PRP LR or Operations & Maintenance and SubAction Name = Cleanup Goals Achieved) in CERCLIS. This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = LTRA (LR) or PRP LR (ME) or O&M SubAction = Cleanup Goals Achieved (OQ)	Program Measure	F	Final Remedial Action Report	Written approval from regional official (Branch Chief or above)	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

v. NPL Site CompletionsDefinition:

An NPL site must meet all six criteria below to be eligible for site completion:

- Cleanup goals specified in the RODs or removals are met;
- Institutional controls are in place;
- All Remedial Action Reports, On-Scene Coordinator Reports, and Pollution Reports have been completed;
- All RODs, ROD Amendments, and Explanation of Significant Differences (ESDs) have been completed;
- The site is protective of human health and the environment; and
- The only remaining activities, if any, at the site are operation and maintenance activities that are performed by the state, Federal facility, or responsible parties.

There is only one NPL Site Completion per NPL site, and the site must be final on the NPL. For more detailed information, see OSWER Directive 9320.2-09A-P, "Close Out Procedures for National Priorities List Sites."

Definition of Accomplishment:

A NPL Site Completion occurs when the Final Close-out Report (FCOR) has been signed by the Regional Administrator and concurred with by HQ. The region must enter the completion date (Actual Complete) of the Final Close-Out Report Action Name = Close-Out Report into CERCLIS. EPA is responsible for documenting site completion; therefore all FCOR actions are given a Fund-financed lead code.

For examples of when to prepare FCORs, see the table in section B.A.3.q, Completion of Response Action/Activity.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Regions may receive credit under this measure and the NPL Site Construction Completion measure as a result of the same Final Closeout Report. This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Close-Out Report (CQ)	Program Measure	F	Final Close-out Report (FCOR).	Signed by the Regional Administrator with HQ concurrence.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

w. Five Year ReviewsDefinition:

A Five Year Review is a review of remedial action(s) selected under CERCLA '121(c). The purpose of the Five Year Review is to determine whether the remedy at a site is/remains protective of human health and the environment and to evaluate the implementation and performance of the selected remedy. Where remedial actions are still under construction, a Five Year Review determines whether immediate threats

have been addressed and whether EPA continues to expect the remedy to be protective when all remedial actions are complete. EPA conducts statutory reviews of any site at which a post-SARA remedy, upon attainment of cleanup levels specified in the ROD, will not allow for unlimited use and unrestricted exposure. EPA conducts policy reviews at sites where remedial actions will attain cleanup levels that, upon completion, will allow for unlimited use and unrestricted exposure but will take longer than five years to complete, at sites with pre-SARA remedies at which the cleanup levels do not allow for unlimited use and unrestricted exposure, and at NPL removal only sites where cleanup levels do not allow unlimited use and unrestricted exposure. EPA may also conduct Five Year Reviews at their discretion for other sites.

Definition of Accomplishment:

Five Year Review Starts:

- ***Fund-financed (Including F-, TR-, S- or EP-lead actions)*** - EPA or the state begins any of the tasks discussed in the latest Five Year Review Guidance. This action may be documented by a memo to the file or EPA approval of a workplan for the Five Year Review. Note: EP-lead Five Year Reviews should have no associated funding.
- ***PRP-financed (Including RP- or PS-lead actions)*** - EPA approves the Five Year Review workplan submitted by the PRPs under the terms of an enforcement instrument. These lead codes indicate who finances and may perform some of the work. The Five Year Review is still required to be approved and signed by EPA.
- ***PRP-financed from a Special Account (Special Account Financed Action performed by EPA (SA lead))*** - A PRP-financed Five Year Review from a Special Account is started when EPA approves the Five Year Review workplan.

The actual start date (Actual Start) for the Five Year Review (Action Name = Five Year Review) is not required to be entered into CERCLIS.

Five Year Review Completions

Planned Completion Date: Five Year Review planned completion dates, and the Report Due (SubAction Name = FYR Report Due) date are system generated based on Five Year Review type entered at the time of ROD completion or when the Five Year Review action is entered through the project schedule.

Statutory: The Five Year Review and FYR Report Due planned completion date fields are populated for five years after the RA On-Site Construction Start SubAction planned completion date. Both the Five Year Review planned completion date and the FYR Report Due planned completion date will be updated by the system based on the changes to the planned or actual completion dates for the triggering RA On-Site Construction Start subaction. The Five Year Review planned completion date will be editable. The FYR Report Due planned completion date will be greyed out and uneditable and will be locked once the actual completion date for the RA On-Site Construction Start subaction is entered.

Policy: The Five Year Review and FYR Report Due planned completion dates are populated for five years after the PCOR or FCOR planned completion date. Both the Five Year Review planned completion date and the FYR Report Due planned completion date will be updated by the system based on changes to the planned or actual completion dates for the triggering PCOR or FCOR. The Five Year Review planned completion date will be editable. The FYR Report Due planned completion date will be greyed out and uneditable and will be locked once the actual completion date of the PCOR or FCOR is entered.

Discretionary: The Five Year Review planned completion date is based on the date set by the user at the time of entry of Five Year Review type.

No Review: No Five Year Review action will be generated.

Actual Completion Date: The Five Year Review is complete on the date the designated regional official signs the Five Year Review report stating whether the remedy is, or is not, protective of human health and the environment. The actual completion date (Actual Complete) for the Five Year Review (Action Name = Five Year Review) must be entered into CERCLIS.

Five Year Review Addendum Completion Subaction

Planned Completion Date: Five Year Review Addendum (Subaction name = FYR Addendum) planned completion date is system generated based on the date entered into the Five Year Review Protectiveness

determination tab in the “Planned Date of Addendum” text box for sites that have a “Protectiveness Deferred” OU-specific or sitewide determination. The FYR Addendum Planned Completion date will be editable.

Actual Completion Date: A Five Year Review Addendum is complete on the date the designated regional official signs the Five Year Review addendum stating a new protectiveness determination of all remedies that have deferred protectiveness determinations. The actual completion date (Actual Complete) for the Five Year Review Addendum subaction must be entered into CERCLIS.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

A new Five Year Review module was implemented in CERCLIS on June 26, 2006. While the data that is being captured is still the same, there are several noticeable differences. In CERCLIS there is now:

- A Five Year Review addendum subaction for completed reviews with protectiveness deferred statements;
- The ability to update a trigger on a planned Five Year Review;
- The ability to modify the Five Year Review type on a planned review;
- The ability to associate issues/recommendations with the correct OU and response actions;
- The ability to enter/track more than one Five Year Review with multiple OUs for each site;
- A Missing Data Tab is available on the FYR screen that informs the user of all missing information and includes the OU that it affects; and
- The ability to update milestone dates for Five Year Review Issues and Recommendations to track implementation.

In order to receive credit for a Five Year Review completion the region must enter the following data into CERCLIS through the SCAP screens:

- applicable OUs
- the associated remedy(ies) with issues
- associated issue for each OU (if there is no issue, enter the relevant OU(s) with the “No Issue” category)
- recommendations or follow-up actions (a party responsible, oversight agency, and milestone date must be identified for each recommendation or follow-up action)
- protectiveness determination for each remedy/OU (if a determination is deferred, enter a date for when a protectiveness determination will be made)
- protectiveness statement as it appears in the Five Year Review

If the Construction Completion flag has been checked for the site, the user must enter the following information:

- site protectiveness determination
- site-wide protectiveness statement as it appears in the Five Year Review

In order to receive credit for the FYR addendum subaction completion, the user must enter the following information:

- The new protectiveness determination for those OUs that were deferred;
- Protectiveness statement as it appears in the Five Year Review; and
- If new issues/recommendations are referenced in the Five Year Review Addendum, enter them into the Five Year Review screens through the FYR parent action for the addendum subaction.

All Sites must have the following information:

- If future Five Year Reviews are not necessary at the site, indicate that this is the final Five Year Review at the site

Five Year Review completes must be planned and reported site-specifically (Action Name = Five Year Review) in CERCLIS. Funds are allocated in the Remedial Action AOA. This is a program target for

Superfund. Five Year Review completes are a Program Measure for Federal facilities (See Exhibit B.1 in Appendix B and Exhibit D.1 in Appendix D).

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Five Year Review		F, TR, S, EP	Start: Memo; or Workplan	Date of memo to file documenting tasks. EPA approval	Within 5 working days, but no later than 10 working days.
Action name = Five Year Review		MR, RP, PS, SA	Start: Five Year Review workplan	EPA approval	Within 5 working days, but no later than 10 working days.
Action name = Five Year Review	Program Target	F, TR, S, EP, MR, RP, PS, SA	Complete: Five Year Review report	Signed by regional official.	Within 5 working days, but no later than 10 working days.

x. Partial NPL Deletion

Definition:

EPA will consider partial deletion for portions of sites when no further response is appropriate for that portion of the site. Such portion may be a defined geographic unit of the site, perhaps as small as a residential unit, or may be a specific medium at the site (e.g., ground water), depending on the nature or extent of the release(s). The criteria for partial deletion are the same as for final deletion. EPA must consider, in consultation with the state, whether the following criteria have been met for that portion of the site:

- Responsible or other parties have implemented all appropriate response actions required;
- All appropriate Fund-financed response under CERCLA has been implemented, and no further cleanup by responsible parties is appropriate; or
- The remedial investigation has shown that the release poses no significant threat to public health, or the environment and, therefore, taking of remedial measures is not appropriate.

Definition of Accomplishment:

The partial NPL deletion process begins when a Notice of Intent to Partially Delete (Action Name = Notice of Intent to Partially Delete) is published in the Federal Register for the specified portion of a site on the NPL. Notice of Intent to Partially Delete is completed (Actual Complete) the day the Federal Register is published. If the Direct Final Process for Partial Deletions is used, the process begins when the Direct Final Action Notice is published in the Federal Register (Action Name = Notice of Intent to Partially Delete).

The partial NPL deletion process (Action Name = Partial NPL Deletion) is complete (Actual Complete) when the Notice of Partial Deletion is published in the Federal Register for the specified portion of a site on the NPL. If the Direct Final Process for Partial Deletions is used and the comment period has ended with no adverse comments, the actual completion (Actual Complete) is the effective date of deletion specified in the Direct Final Action Notice.

Start dates are not required for either the Notice of Intent to Partially Delete (NOIPD) or the Partial NPL Deletion actions. The completion of the NOIPD action signifies the start of the partial deletion action.

HQ will enter the Partial Deletion and the Notice of Intent to Partially Delete from the NPL Action and the completion dates into CERCLIS.

For more detailed information, see OSWER Directive 9320.2-09A-P, "Close Out Procedures for National Priorities List Sites."

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Partial NPL deletions are tracked separately from final NPL deletions. Partial site NPL deletions will be entered by HQ if a portion or portions of the release remain listed on the NPL following completion of the partial deletion. Partial deletions will only be coded at specific Operable Units (OUs) when a single OU is subject to the partial deletion and the particular OU is specified in the Notice of Intent to Partially Delete in the Federal Register.

Partial deletion actions that address multiple OUs or areas that do not directly correspond to a specific OU will be coded at OU00 (sitewide).

A site deletion (Action Name = Deletion from NPL) will be entered by HQ if the deletion activity addresses the remaining release listed on the NPL (either as a one-time deletion activity for the entire site as originally listed, or as the last deletion activity associated with a site subject to previous partial deletions). This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Notice of Intent to Partially Delete (TV) Completion	Program Measure	F	Notice of Intent to Partially Delete or Direct Final Action Notice.	Published in the <i>Federal Register</i> .	Within 5 working days, but no later than 10 working days.
Action name = Partial NPL Deletion (GR) Completion	Program Measure	F	Notice of Partial Deletion or Direct Final Action Notice.	Published in the <i>Federal Register</i> .	Within 5 working days, but no later than 10 working days.

y. Final NPL DeletionDefinition:

With state concurrence, EPA may delete sites from the NPL when it determines that no further response is appropriate under CERCLA. In making that determination, EPA considers:

- Responsible or other parties have implemented all appropriate response actions required;
- All appropriate Fund-financed response under CERCLA has been implemented, and no further cleanup by responsible parties is appropriate; or
- The remedial investigation has shown that the release poses no significant threat to public health or the environment and, therefore, taking of remedial measures is not appropriate.

Definition of Accomplishment:

The deletion process for the entire site begins when a Notice of Intent to Delete (Action Name = Notice of Intent to Delete) is published in the Federal Register. If the Direct Final Process for Deletions is used, the process begins when the Direct Final Action Notice is published in the Federal Register (Action Name = Notice of Intent to Delete).

The deletion process for the entire site (Action Name = Deletion from the NPL) is complete (Actual Complete) when the Notice of Deletion is published in the Federal Register. If the Direct Final Process for Deletions is used and the comment period has ended with no adverse comments, the actual completion (Actual Complete) is the effective date of deletion specified in the Direct Final Action Notice.

Start dates are not required for either the Notice of Intent to Delete (NOID) or the Deletion from the NPL actions. The completion of the NOID action signifies the start of the deletion action.

HQ will enter the Final Deletion from the NPL Action and the actual completion dates into CERCLIS. For more detailed information, see OSWER Directive 9320.2-09A-P, "Close Out Procedures for National Priorities List Sites."

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

The Action, Final Deletion from the NPL, will be used whether deletion is accomplished through the Notice of Deletion or the Direct Final Action Notice. When the Notice of Deletion is published or the date of deletion is effective, HQ will change the NPL Status in CERCLIS to "Deleted from Final NPL." This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/Date Requirements	Data Must Be Entered By
Action name = Notice of Intent to Delete (TU) Completion	Program Measure	F	Notice of Intent to Delete or Direct Final Action Notice.	Published in the <i>Federal Register</i> .	Within 5 working days, but no later than 10 working days.
Action name = Deletion from the NPL (ND) Completion	Program Measure	F	Notice of Deletion or Direct Final Action Notice.	Published in the <i>Federal Register</i> .	Within 5 working days, but no later than 10 working days.

z. Site with Land Ready for Reuse

The Agency is no longer collecting information on this performance measure.

aa. Acres at Sites with Land Ready for Reuse

The Agency is no longer collecting information on this performance measure.

bb. Sitewide Ready for Anticipated Use

Definition:

The Sitewide Ready for Anticipated Use (RAU) measure reports sites documented as ready for reuse where, for the entire construction complete final or deleted NPL site:

- All cleanup goals in the Record(s) of Decision or other remedy decision document(s) have been achieved for media that may affect current and reasonably anticipated future land uses of the site, so that there are no unacceptable risks; and
- All institutional or other controls required in the Record(s) of Decision or other remedy decision document(s) have been put in place.

For more information about this measure, please refer to OSWER 9365.0-36, "Guidance for Documenting and Reporting the Superfund Sitewide Ready-for-Reuse Performance Measure" and OSWER 9200.1-74, ["Guidance for Documenting and Reporting Performance in Achieving Land Revitalization."](#)

Definition of Accomplishment:

A site meets Sitewide RAU when a hard copy checklist has been completed, signed by a regional approving official, submitted to headquarters, and the entire site meets the criteria established in the guidance. All acres that are part of the Superfund site universe must be documented as RAU within

CERCLIS prior to the region's submission of a property reuse evaluation checklist. The Sitewide RAU date entered into CERCLIS should be the signature date on the Checklist of the regional reviewing official.

Change in Definition FY 06/07 - FY 08/09:

In 2006, this GPRA measure was known as Sitewide Ready for Reuse. In 2007, it was renamed Sitewide Ready for Anticipated Use.

Special Planning/Reporting Requirements:

The Sitewide RAU measure is for construction complete Superfund final and deleted NPL sites only. Regions will submit completed Checklists for the Sitewide RAU measure to Headquarters for approval before the reported site may be counted to meet the GPRA target for this measure. The Sitewide RAU completion date that is entered into CERCLIS should be the exact date that the Regional approving official signs the hard-copy Sitewide RAU Checklist form. Regions began reporting Sitewide Ready for Reuse sites in FY 2006. In FY 2007, the name of the measure was changed to Sitewide Ready for Anticipated Use. This is a GPRA annual performance goal. EPA will continue to track the Sitewide RAU measure as a discrete measure with targets.

The determination that a site is Sitewide RAU is based on the information available at the time the determination is made. That determination may revert if site conditions change, or if new or additional information is discovered regarding the contamination at the site. If the Sitewide RAU determination does revert, a retraction statement should be sent to Headquarters. The site can be re-designated as Sitewide RAU only when the requirements are met. If, at the time of determination or at any other time, EPA becomes aware of other environmental problems that pose unacceptable risk relevant to site use or reuse, including risks addressed under other cleanup or public health authorities, the site should not be reported under this measure.

A site's CPRM data will only be counted in Superfund totals if the site has the Special Initiative flag of 'CU' (CPRM Universe) associated to it at the site level. This flag places the site in the Superfund "universe", therefore ensuring that its CPRM data is being captured.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/Date Requirements	Data Must Be Entered By
Action Name = PRP/RAU Evaluation Checklist	GPRA APG	EP	Property Reuse Evaluation	Signed by Regional division director or designee.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

cc. Protective for People Under Current Conditions (PFP)

Definition:

This new measure is based on the existing Site-Wide Human Exposure Environmental Indicator and reports sites and land area, as measured in acres, that are protective for people under current conditions.

The PFP performance measure reports the number of sites and acres at which there is no complete pathway for human exposures to unacceptable levels of contamination, based on current site conditions. Reporting on a particular site for this measure should be based on an understanding of current conditions, presence and toxicity of contamination, routes of contaminant migration (e.g., vapor intrusion), and routes of exposures to humans (e.g., dermal, inhalation, ingestion).

Achieving the PFP measure means, at a minimum, that all identified human exposure pathways from contamination at the site are under control or possible exposures are below health-based levels for current land use conditions. "Under control" means that adequately protective controls are in place to prevent any unacceptable human exposure under current land use conditions. Achieving the PFP measure does not involve consideration of future use conditions or ecological receptors. The PFP measure can be achieved through temporary solutions based on current conditions and associated exposures at a given point in time, and does not necessarily require that all cleanup goals be met at a site or OU.

For the purposes of this measure, the entire site or individual OUs at a site can be counted so long as the criteria are met for those areas.

For the purposes of this measure, a site or OU will achieve the PFP performance measure when it can be determined that the entire area comprising the site or OU meets any one of the three possible designations for the current Human Exposures Under Control Environmental Indicator, which currently apply to NPL sites only. The current Environmental Indicators Guidance is included in Appendix B. The three designations in the existing Site-Wide Human Exposure Environmental Indicator that ensure acres meet PFP include:

- Current Human Exposures Under Control;
- Current Human Exposures Under Control and Protective Remedy or Remedies in Place; or
- Current Human Exposures Under Control and Long-Term Human Health Protection Achieved.

Note that an OU or entire site may meet PFP if the ground water is contaminated yet no human exposure pathways exist, and the soil above the plume has been investigated to ensure it meets PFP, or is safe for human exposure. It should also be noted that a site may have several OUs with different designations, some of which have met PFP criteria, some of which have also met RAU criteria, and some of which do not meet either performance measure (i.e., are not protective).

The total number of sites with one or more OUs meeting the PFP measure will be determined from information recorded in CERCLIS and routinely reported for management and communication purposes.

Definition of Accomplishment:

Acres can be claimed as Protective for People Under Current Conditions when all identified human exposure pathways from contamination at the site or individual OUs/parcels are under control or possible exposures are below health-based levels for current land use conditions.

The Protective for People designation is achieved when the following occurs:

- PFP/RAU Checklist: The date that EPA completes (Actual Completion Date) and saves the data on the Checklist form, or the date a user revises a completed form (Action Name = PRP/RAU Evaluation Checklist).

Change in Definition FY 06/07 - FY 08/09:

These performance measures were implemented at the end of FY 2007.

Special Planning/Reporting Requirements:

A new CERCLIS Land Reuse module was designed to track these new measures in CERCLIS. The module was released in June 2007.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/Date Requirements	Data Must Be Entered By
Action Name = PFP/RAU Evaluation Checklist	Program Measure	EP	Checklist Form	Signed by Regional division director or designee.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/Date Requirements	Data Must Be Entered By
					the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

dd. Ready for Anticipated Use (RAU)Definition:

This new measure replaces “Acres of Land Ready for Reuse” as well as “Sites Ready for Reuse” as defined in the 2004 Guidance. This RAU measure also includes the land area, as measured in acres, at sites that meet the 2006 Sitewide RfR (now renamed “Sitewide RAU”) Guidance for continued and anticipated use, as well as any other acres that meet RAU criteria.

Ready for Anticipated Use (RAU) Performance Measure: The RAU performance measure captures the acreage within sites or OUs that are PFP and meet the following two additional criteria:

- All cleanup goals have been achieved for media that may affect current and reasonably anticipated future land uses (or decision documents confirm uncontaminated acres) for the site or OU such that there is no unacceptable risk, and
- All institutional or other controls identified as part of the response action to help ensure long-term protection have been put in place.

The definition of this measure as it applies to an entire site is consistent with the Sitewide RAU measure. Therefore, all sites and acres counted toward the Sitewide RAU measure will also count toward the RAU measure. In addition, the RAU measure described here may also include individual OUs and a broader universe of sites (i.e., SA, NTCRA, certain non-NPL Federal facilities, FUDS, etc) than those included in the Sitewide RAU measure.

The determination that an OU achieves the RAU measure can occur at any particular point in time and the OU’s reported status should be revised if the site’s conditions change or if new or additional information is discovered regarding the contamination or conditions at the site (e.g., contaminant occurrence, migration, toxicity levels for specific contaminants, and exposures). If at the time of the determination, or at any other time, EPA becomes aware of other environmental problems that pose unacceptable risk relevant to the site or reuse, including risks addressed under other cleanup or public health authorities, the site should not be reported under the RAU measure. Documentation that OUs achieve the RAU measure should be changed accordingly if, or when, information becomes available that would bring into question whether the OUs continue to meet the RAU definition. Those specific acres associated with the OU in question should only be re-recorded as meeting the RAU measure if and when acres once again meet the RAU definition.

The total number of sites with one or more OUs meeting the RAU measure will be determined from information recorded in CERCLIS and routinely reported for management and communication purposes.

For more information about this measure, please refer to the [”Guidance for Documenting and Reporting Performance in Achieving Land Revitalization: The Office of Superfund Remediation and Technology Innovation \(OSRTI\) and Federal Facilities Restoration and Reuse Office \(FFRRO\).”](#)

Definition of Accomplishment:

The RAU performance measure captures the acreage within sites or OUs that are PFP and meet the following two additional criteria: (1) all cleanup goals have been achieved for media that may affect current and reasonably anticipated future land uses (or decision documents confirm uncontaminated acres) for the site or OU such that there is no unacceptable risk, and (2) all institutional or other controls identified as part of the response action to help ensure long-term protection have been put in place.

The Total RAU designation at a site or OU is achieved when the following occurs:

- PFP/RAU Checklist: The date that EPA completes (Actual Completion Date) and saves the data on the Checklist form, or the date a user revises a completed form (Action Name = PRP/RAU Checklist).

Change in Definition FY 06/07 - FY 08/09:

These performance measures were implemented at the end of FY 2007.

Special Planning/Reporting Requirements:

Universe Indicator: The Universe Indicator seeks to count the total number of acres and sites that have been investigated at all sites since program inception. In order to be included in the Universe Indicator, the site should be eligible for investigation under CERCLA, or as the result of EPA's involvement at BRAC facilities. For sites that are proposed for, listed on, or deleted from the NPL, or for SA sites, acres included in the Universe Indicator should be investigated in a manner consistent with the Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA. Similarly, NTCRA sites should be investigated in a manner consistent with Guidance on Conducting Non-Time-Critical Removal Actions Under CERCLA. Both remedial and NTCRA sites and acres where initial investigations indicate that no unacceptable risks exist, and therefore no further action is required, should be included in the Universe Indicator.

The Universe Indicator and performance measures apply to the following contaminated or potentially contaminated media - land, wetlands, surface water, and/or sediments - provided that media is subject to Superfund and Federal facilities remedial investigation, oversight, and/or response action. However, the acres captured under the Universe Indicator do not include land areas overlying a ground water plume where those land areas are not intended to be assessed consistent with applicable EPA guidance. For example, if a plume extends under a land area and EPA has no intention of investigating these acres of land for contamination unrelated to the plume, then those land acres would not be included in the acreage reported by the Universe measure. By extension, a site with only ground water contamination would not be captured by the Universe Indicator. Note that there may also be exceptions in which sites with areas of surface water, sediments, and/or tidal basins will not automatically be included due to site-specific circumstances. These types of sites will be dealt with on a case-by-case basis.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	Action Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = PFP/RAU Evaluation Checklist	Program Measure	EP	Checklist Form	Signed by Regional division director or designee.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

ee. Site-Wide Human Exposure Environmental Indicator

Definition:

The Site-Wide Human Exposure Environmental Indicator documents for Proposed, Final, and Deleted NPL sites and Superfund Alternative sites, the progress achieved towards providing long-term human health protection by measuring the incremental progress achieved in controlling unacceptable human exposures at a site. This is a GPRA measure.

- Reducing the level of contamination. For purposes of this policy, "contamination" generally refers to media containing contaminants in concentrations above appropriate protective risk-based levels

associated with complete exposure pathways to the point where the exposure is no longer "unacceptable;" and/or

- Preventing human receptors from contacting contaminants in-place; and/or
- Controlling human receptor activity patterns (e.g., by reducing the potential frequency or duration of exposure).

Five categories have been created to describe the level of human health protection achieved at a site:

- Insufficient data to determine human exposure control status;
- Current human exposures not under control;
- Current human exposures under control;
- Current human exposures under control and protective remedy or remedies in place; and
- Current human exposures under control, and long-term human health protection achieved.

Definition of Accomplishment:

The criteria for determining the Site-Wide Human Exposure status at a site are found in the Environmental Indicators Guidance Manual, the Long-Term Human Health Protection Data Quality Objectives document, and on the Superfund Environmental Indicators Website.

Change in Definition FY 06/07 - FY 08/09:

Indicator name has changed from Long-Term Human Health Protection indicator to Site-Wide Human Exposure Environmental Indicator. As of FY 2008, the Site-Wide Human Exposure Indicator is required for NPL Proposed and Superfund Alternative sites in addition to Final and Deleted NPL sites.

Special Planning/Reporting Requirements (Business Practices for Updating HE Data and Communicating with the Public):

The HE evaluation reflects current, site-wide conditions. For sites that have been categorized as "current human exposures under control and long-term human health protection achieved," it also reflects reasonably anticipated future, site-wide conditions. As data collection and analysis or response actions occur or environmental conditions change, it is expected that Regions will update HE evaluations and update CERCLIS to reflect changes in status. This should generally occur within 10 days of a known change. It is expected that Regions will review the status of all HE evaluations at a minimum annually and confirm that each site has an updated and accurate HE evaluation.

Changes in EI Status

Update CERCLIS within 10 days of determining that the HE status has changed.

No Change in EI Status

If there is no change in the status of the site, update the "Last Review Date" in CERCLIS on the HE tab in the Environmental Indicators module within 10 days of the review.

Entering Human Exposure Data in the Justification Field of the HE CERCLIS Module

EPA has committed to providing current human exposure evaluations to the public via its Superfund Site Profiles available on the internet. As part of this effort, the Agency will provide descriptions of situations where a site is categorized as "Insufficient Data" or "Not Under Control." This information will be derived from CERCLIS. Consequently, it is critical Regions maintain the quality of the "justification" descriptions in the CERCLIS data base.

When making a Human Exposure Not Under Control or Insufficient Data evaluation in CERCLIS, Regions must record exposure descriptions in the "Justification" field in order to save the evaluation as draft. The purpose of this approach is to provide the public with a succinct and clear description of why a site is so listed, along with information about the steps EPA plans to take to address the exposures. Upon OSRTI review and approval of the justification text, the human exposure evaluation will be saved in CERCLIS as final.

To help standardize the descriptions entered into CERCLIS, and to assure that similar exposure scenarios are described consistently across Regions, the templates below should be used when populating the "Justification" field. The information entered in this field will appear on the publicly available Superfund Site Progress Profiles Webpage, so it should be accurate, updated when necessary, and contain the information outlined below.

General Template for Sites with an HE Evaluation of Not Under Control

The (insert site name) Superfund site is considered "Current Human Exposure Not Under Control" because (insert a detailed description of the current completed human exposure pathway(s) not under control; include the contaminants of concern and media).

As of ____ (date) the planned activities to address this pathway are (____).

(As appropriate, add:

In addition, EPA (or state, or PRP or Federal Agency as appropriate) is currently (insert summary descriptions of actions underway to address human exposures. (Include any temporary controls that have been put in place to address this exposure scenario e.g., fish advisory, fencing, signs))

Example:

The Site X Superfund site is considered "Current Human Exposure Not Under Control" because residents and recreational users of the creek can be exposed through direct contact to arsenic and lead contaminated soils and sediments.

As of July 2007, the planned activities to address this pathway are continuation of ongoing removal of arsenic and lead contaminated soils.

EPA has already begun cleaning up the contaminated soil. Removal actions started in April 2007. Temporary fences to prevent access to the site were installed in May 2007. Warning signs identifying the area as a Superfund site were posted in June 2007.

General Template for New Sites with an HE Evaluation of Insufficient Data:

As of (insert date) there is insufficient information to determine the site-wide Human Exposure Control status at (insert site name) Superfund Site.

(Provide general context for why there is insufficient data at the site. An example:

(Insert site name) was (proposed/finalized) for the NPL on MM/DD/YY, and there has been no evaluation of the human health exposure indication yet. This does not necessarily mean that unacceptable exposures are occurring.)

As of ____ (date) the planned activities to collect sufficient information to make a human exposure evaluation are (____).

(As appropriate add the following:

In addition, EPA (or state, or PRP or Federal Agency as appropriate) is currently (insert descriptions of actions underway to address human exposures. (Include any temporary controls that have been put in place to address this exposure scenario e.g., fish advisory, fencing, signs))

General Template for Longer Term Cleanups with a Newly Identified Exposure Pathway and/or Contaminant(s):

As of (insert date) there is not sufficient information available to determine the site-wide Human Exposure Control status at X Superfund Site because of a newly identified potential exposure pathway and/or contaminant(s) (insert a detailed description of the human exposure pathway of concern, include the contaminants of concern and media).

The activities planned to make the HE evaluation include (____) (list whatever activity is necessary to make the evaluation: e.g., data needed, conduct sampling, monitor basements for vapor intrusion, complete risk assessment, and conduct well surveys).

(As appropriate, add the following:

In addition, EPA (or state, or PRP or Federal Agency as appropriate) is currently (insert summary of actions underway to address human exposures. (Include any temporary controls that have been put in place to address this exposure scenario e.g., fish advisory, fencing, signs))

Data Entry Timeliness Requirement:

As data collection and analysis or response actions occur or environmental conditions change, it is expected that the Region will review the status of all HE evaluations and update CERCLIS to reflect the change in status. This should generally occur within ten days. It is expected that Regions will review the status of all HE and GM evaluations at a minimum annually, and confirm that each site has an updated and accurate HE evaluation. HE and GM evaluations must be made (and entered) or reviewed at all Proposed, Final, and Deleted NPL sites and Superfund Alternative sites prior to the end of the fiscal year, September 30. HE and GM changes entered after September 30 will be counted as accomplishments for the fiscal year beginning on October 1. This practice may differ from that required for other measures; special notice should be taken. Site condition changes may be documented in RODs, ROD Amendments, Removal Action Memoranda, Pollution Reports, Close Out Reports, and Five Year Reviews.

Accuracy Requirement

The Site-Wide Human Exposure Environmental Indicator is designed to allow RPMs to make first-hand determinations based on their knowledge of current conditions at a site as well as actions undertaken at a site. Complete certainty regarding the above factors is not a necessary condition to make a Site-Wide Human Exposure evaluation at a site. In characterizing a site as "current human exposures not under control", a region is making a determination that: 1) there are currently completed human exposure pathways and 2) that those exposure pathways pose an unacceptable risk to humans based on the magnitude, frequency, duration and route(s) of exposure relative to the exposure concentrations and chemical intakes. Where a region lacks sufficient information to make such a determination on whether there are completed pathways or whether a completed pathway poses an unacceptable risk, a site should be classified as "insufficient data to determine human exposure control status". A site is placed in one of the three "under control" categories when a Region has determined that there are not currently completed human exposure pathways or that exposure(s) that may be occurring do not pose an unacceptable risk to humans based on the magnitude, frequency, duration and route(s) of exposure relative to the exposure concentrations and chemical intakes. Documents such as RI/FS reports, RODS, Action Memoranda, Pollution Reports, and Close Out Reports are typically consulted by RPMs to assist completion of the HE worksheet. In support of their response to each worksheet question, the RPMs are required to provide the source documents in the "Reference Document" and corresponding SDMS reference document number in the SDMS document field for each worksheet question.

Reports and Guidance

- SCAP 15
- Program Management 11 (PGMT-11)
- Program Management 12 (PGMT-12)
- Program Management 13 (PGMT-13)
- PGMT-12 Errors Report

EXHIBIT B.2. SUPERFUND LONG-TERM HUMAN HEALTH PROTECTION WORKSHEET

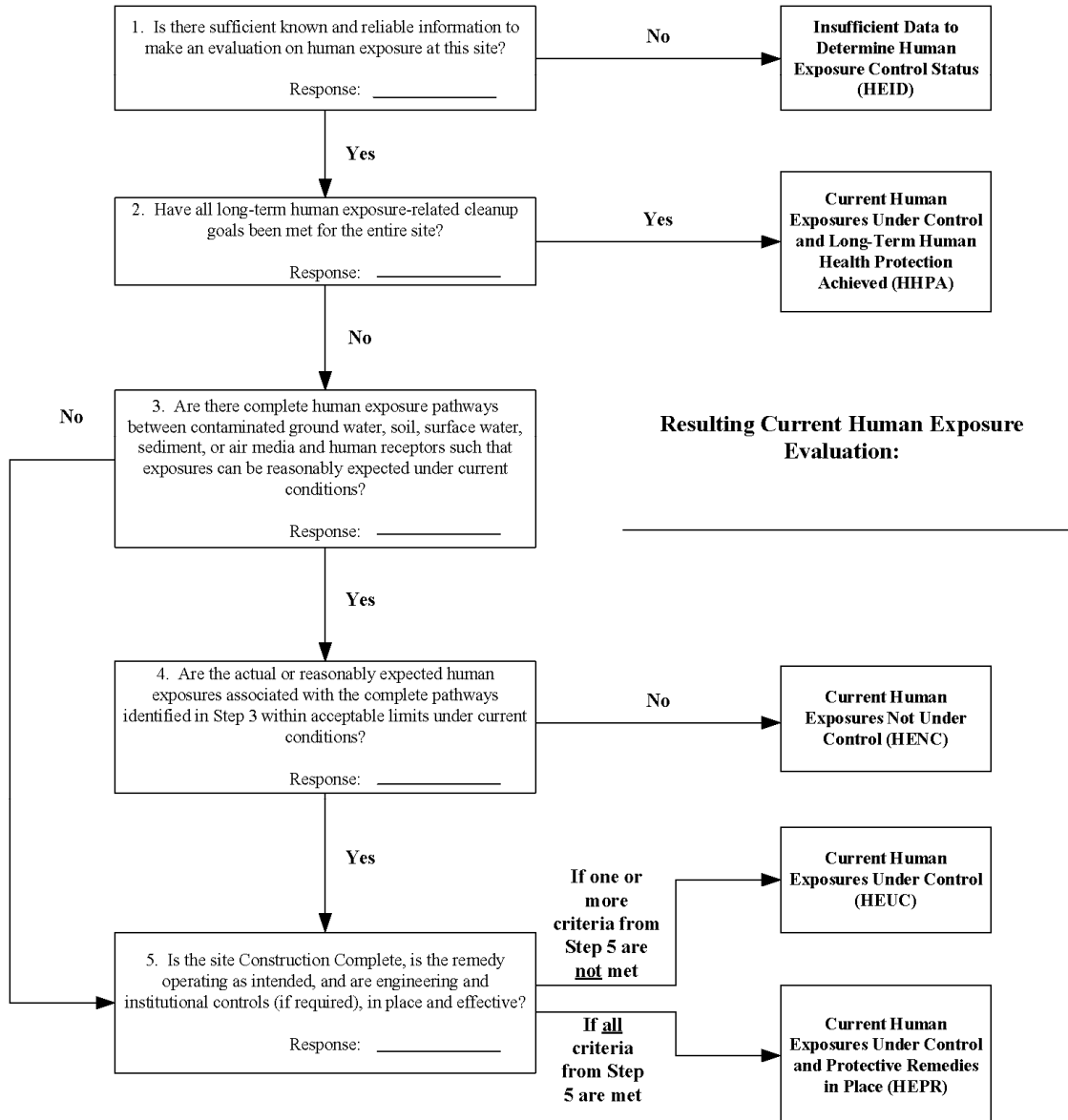
Site Name: _____

Date: _____ Estimated Current HE Under Control Date: _____

Estimated Current LTHHP Under Control Date: _____ RPM Certified: ☐

Exposure Paragraph for HE "Not Under Control" or "Insufficient Data" Sites is Entered in CERCLIS?

Yes: _____ (date) No: _____



ff. Migration of Contaminated Ground Water Under ControlDefinition:

The Migration of Contaminated Ground Water Under Control indicator assesses for NPL sites only whether ground water contamination is below protective, risk-based levels or, if not, whether the migration of contaminated ground water is stabilized and there is not unacceptable discharge to surface water and monitoring will be conducted to confirm that affected ground water remains in the original area of contamination. This indicator is limited to sites with known past and/or present ground water contamination. This is a GPRA measure.

Definition of Accomplishment:

The criteria for determining if ground water migration is controlled are found in Migration of Contaminated Ground Water Under Control Survey (refer to Exhibit B.3), the Environmental Indicators Guidance Manual, the Long-Term Human Health Protection Data Quality Objectives document, and on the Superfund Environmental Indicators Website.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

The Migration of Contaminated Ground Water Environmental Indicator worksheet must be completed in CERCLIS and/or reviewed before the end of the fiscal year. If there is a known change in GM status, CERCLIS should be updated within ten days (Program Management/Environmental Indicators).

Data Entry Timeliness Requirement:

As data collection and analysis or response actions occur or environmental conditions change, it is expected that the Region will review the status of all GM evaluations and update CERCLIS to reflect the change in status. This should generally occur within ten days. It is expected that Regions will review the status of all GM evaluations at a minimum annually, and confirm that each site has an updated and accurate HE evaluation. HE and GM evaluations must be made (and entered) or reviewed at all Proposed, Final, and Deleted NPL sites and Superfund Alternative sites prior to the end of the fiscal year in order to be included in the SCAP end of year report pull (Generally, the year-end pull is done on the tenth business day of October). Site condition changes may be documented in RODs, ROD Amendments, Removal Action Memoranda, Pollution Reports, Close Out Reports, and Five Year Reviews.

Accuracy Requirement:

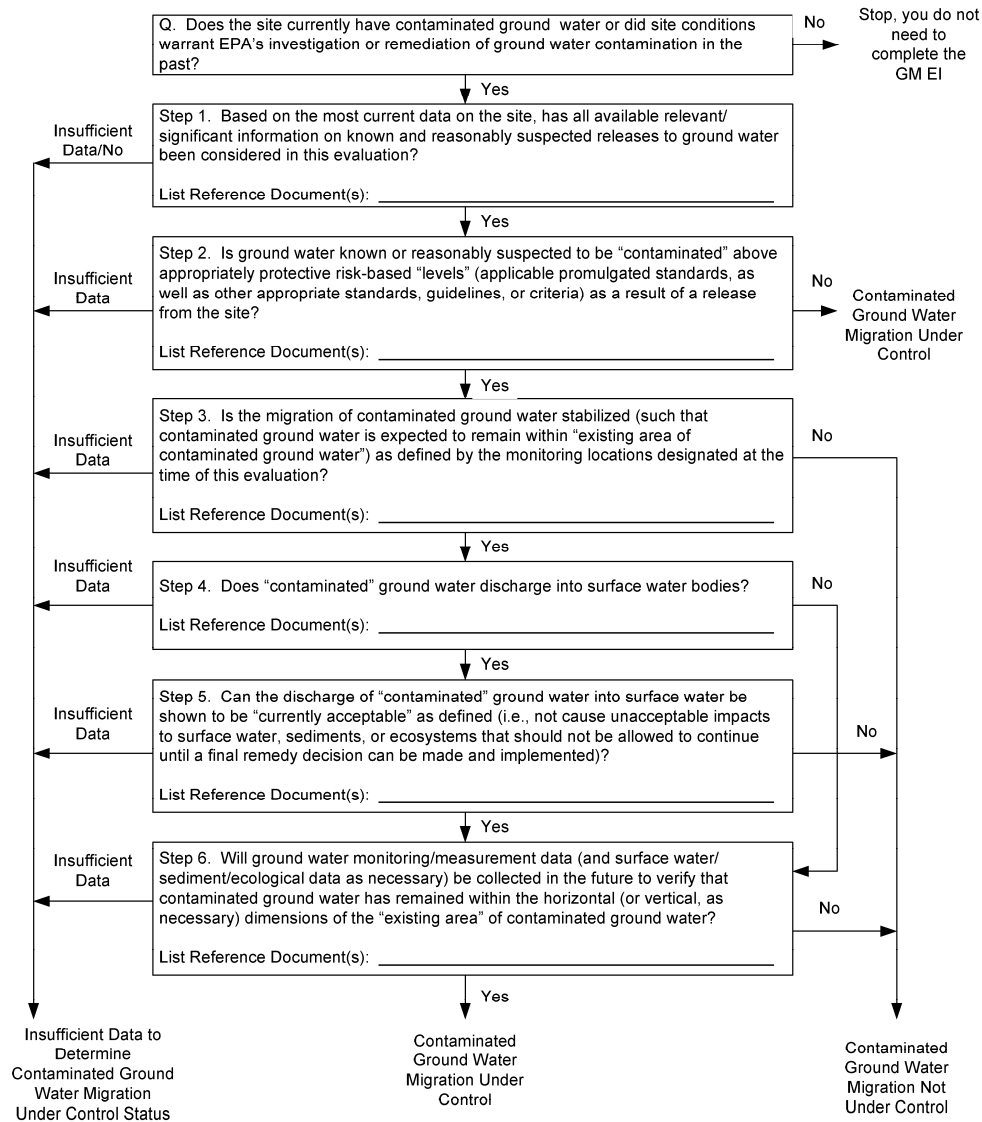
The Ground Water Migration approach was designed to allow RPMs to make first-hand determinations based on their knowledge of current conditions at a site as well as actions undertaken at a site. These determinations must be made with reasonable certainty using all available documentation on media contamination for current land and ground water use. Documents such as RI/FS reports, RODs, Action Memoranda, Pollution Reports, and Close Out Reports are typically consulted by RPMs to assist completion of the surveys. In support of their response to each survey question, the RPMs are required to provide the source documents in the "Reference Document" and corresponding SDMS reference document number in the SDMS document field for each surveys question.

Reports and Guidance:

- SCAP 15
- Program Management 11 (PGMT-11)
- Program Management 12 (PGMT-12)
- Program Management 13 (PGMT-13)

EXHIBIT B.3. SUPERFUND MIGRATION OF CONTAMINATED GROUND WATER UNDER CONTROL WORKSHEET

Definition: Is the migration of contaminated ground water being controlled through engineered or natural processes?



gg. Populations Protected

Definition:

This measure tracks the environmental progress achieved at NPL, Superfund Alternative and non-NPL sites through the protection of human receptors from immediate threats of exposure to contaminated media. The following information will be reported under this measure:

- The number of human receptors protected during removals and remedial actions that result in:
 - Relocation of affected populations; or
 - Provision of an alternate water supply.

Definition of Accomplishment:

Population Protected data is required upon a removal or remedial action start where a population has been either relocated and/or provided an alternative drinking water supply in association with the following actions: Removal; PRP Removal; FF Removal; Remedial Action; PRP RA; FF RA; PRP Emergency Removal; or Initial Remedial Measure.

The following information must be entered into CERCLIS for each action resulting in a population being relocated or provided an alternative source of drinking water:

- Action - action associated with the population relocation or the provision of alternative drinking water;
- Affected Date - date the population was relocated or provided alternative drinking water;
- Protection Level - level (permanently, temporarily, or returned/reinstated) at which the population was relocated and or provided alternative drinking water; and
- Number Affected- number of people relocated or provided alternative drinking water.

The Populations Protected screen can be accessed through the one of the following: Program Management/Environmental Indicators or the EI icon can be used on the Removal or Remedial schedule when one of the following actions are selected: Removal; PRP Removal; FF Removal; Remedial Action; PRP RA; FF RA; PRP Emergency Removal; or Initial Remedial Measure.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

See Definition of Accomplishment. Population Protected data is required to be updated once per year. Data documenting relocation or provision of alternative drinking water can typically be found in RODs, Action Memoranda, Pollution Reports, Remedial Actions Reports and Close Out Reports. An SDMS tracking number should be entered in CERCLIS for this measure. This is a program measure.

hh. Cleanup Volume**Definition:**

This measure tracks the amount of contaminated media that has been treated, stabilized, contained, or removed through the use of risk management technologies, engineering techniques, or institutional controls.

Definition of Accomplishment:

Cleanup Volume data is required in association with a removal action (Removal, PRP Removal, FF Removal) start or complete as defined in the Removal Start and Removal Completion measures or a remedial action (Remedial Action, PRP RA, FF RA, PRP Emergency Removal, Initial Remedial Measure) start or complete as defined in the Start of a Response Action/Activity or Completion of a Response Action/Activity measures.

The following information must be entered into CERCLIS for each medium addressed by the completed response action:

- Cleanup Date - date contaminated media was addressed
- Media Name - media name as documented in the Add/Edit Media screen and media type
- Original Amount - amount of contaminated media addressed
- Original Unit - volumetric unit of contaminated media

The Cleanup Volumes screen can be accessed through the following: Program Management/Environmental Indicators or the EI icon can be used on the Removal or Remedial schedule when one of the following actions is selected: Removal; PRP Removal; FF Removal; Remedial Action; PRP RA; FF RA; PRP Emergency Removal; or Initial Remedial Measure.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning and Reporting Requirements:

Cleanup Volume data is required to be updated once per year. Data documenting volumes of contaminated media addressed can typically be found in RODs, Action Memoranda, Pollution Reports, Remedial Actions Reports and Close Out Reports. This is a program measure.

ii. Support Agency AssistanceDefinition:

The activities performed by another entity to support an EPA response are support agency assistance. The support agency furnishes necessary data to EPA, reviews response data and documents, and provides other assistance to EPA. EPA may provide states, political subdivisions, and Indian tribes with funding to carry out a variety of management responsibilities via a support agency Cooperative Agreement to ensure meaningful and substantial involvement in response activities.

Unless otherwise specified in the Cooperative Agreement, all support agency costs, with the exception of RA support agency costs, may be planned under a single Superfund account number designated specifically for support agency activities. RA support agency activities must be planned site-specifically and require cost share provisions.

Definition of Accomplishment:

The start of support agency assistance (Action Name = Management Assistance) is the signature of the Cooperative Agreement by the Regional Administrator or his designee. The completion of support agency assistance is the expiration or termination of the assistance agreement.

Changes in Definition FY 06/07 - FY 08/09:

None

Special Planning/Reporting Requirements:

Funds for support agency assistance are contained in the pipeline operations, enforcement, or Federal facility AOA. Planned and actual start and completion dates are not required in CERCLIS. Funds may be planned or obligated site or non-site and OU specifically; however, they must be outlayed site-specifically. This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	Action Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Management Assistance (MA)	Program Measure	F	<u>Start:</u> Cooperative Agreement. <u>Complete:</u> Expiration or termination of the assistance agreement.	<u>Start:</u> Signed by Regional Administrator or his designee <u>Complete:</u> Expiration or termination of the assistance agreement.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

jj. Technical AssistanceDefinition:

Technical assistance is support provided by a third party to EPA regions to conduct response activities. Third parties that may provide assistance include U.S. Army Corps of Engineers (USACE), U. S. EPA laboratories, U.S. Fish and Wildlife Service, Superfund Technical Assistance and Response Team (START), and Response Action Contracts (RAC) contractors.

Definition of Accomplishment:

The start of technical assistance (Action Name = Technical Assistance) is the obligation of funds for technical assistance. The completion is defined as the completion of the response activities for the stage at which technical assistance was requested.

Changes in Definition FY 06/07 - FY 08/09:

None

Special Planning/Reporting Requirements:

Technical assistance is paid for by the response program and is contained in the pipeline operations AOA. Planned and actual start and completion dates are not required in CERCLIS. Funds may be planned or obligated site- or non-site and OU specifically; however, they must be outlayed site-specifically. This is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Technical Assistance (TA)	Program Measure	EP, F, S, TR, RP, PS, MR	<u>Start:</u> Obligation of funds. <u>Completion:</u> Completion of response activities.	Not specified	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

B.C. SUBJECT MATTER EXPERTS

The following table identifies the subject matter experts for Appendix B Response Actions.

EXHIBIT B.4. SUBJECT MATTER EXPERTS

Subject Matter Expert	Subject Area	Phone #	Email
Richard Jeng	<i>Construction Completion</i>	703-603-8749	jeng.richard@epa.gov
David Reynolds	<i>Data Quality</i>	703-603-8895	reynolds.david@epa.gov
Rich Norris	<i>Environmental Indicators</i>	703-603-9053	norris.rich@epa.gov
Mary Bell	<i>Enforcement</i>	202-564-2256	bell.mary@epa.gov
Brendan Roache	<i>Federal facilities</i>	703-603-8704	roache.brendan@epa.gov
Randy Hippen	<i>Remedy Selection</i>	703-603-8829	hippen.randy@epa.gov
Emily Johnson	<i>Five Year Reviews</i>	703-603-8764	johnson.emily@epa.gov
Jeff Heimerman	<i>Innovative Technology</i>	703-603-7191	heimerman.jeff@epa.gov
Michael Bellot	<i>Institutional Control</i>	703-603-8905	bellot.michael@epa.gov
Greg Sullivan		202-564-1298	sullivan.greg@epa.gov
Tracy Hopkins	<i>Post-Construction</i>	703-603-8788	hopkins.tracy@epa.gov
Jennifer Hovis	<i>Post-Construction</i>	703-603-8888	hovis.jennifer@epa.gov
John J. Smith	<i>Remedial Implementation</i>	703-603-8802	smith.johnj@epa.gov
David E. Cooper		703-603-8763	cooper.davide@epa.gov
Phyllis Anderson	<i>Remedial Lead</i>	703-603-8971	anderson.phyllis@epa.gov
Renee Hamilton	<i>Response Appendix Coordinator</i>	703-603-9092	hamilton.renee@epa.gov
Jayne Michaud	<i>Risk Assessment</i>	703-603-8847	michaud.jayne@epa.gov
Doug Ammon		703-347-8925	ammon.doug.greg@epa.gov
Charles Sands	<i>RODs/Remedy Selection</i>	703-603-8857	sands.charles@epa.gov
Bruce Pumphrey	<i>Superfund Alternative Approach</i>	202-564-4222	pumphrey.bruce@epa.gov
Nancy Browne		202-564-4219	browne.nancy@epa.gov
Tracey Stewart	<i>SF Special Accounts</i>	202-564-1582	stewart.tracey@epa.gov
Filomena Chau		202-564-4224	chau.filomena@epa.gov
Janet Weiner	<i>Superfund Redevelopment (GPRA)</i>	703-603-8717	weiner.janet@epa.gov
Melissa Friedland	<i>Superfund Redevelopment</i>	703-603-8864	friedland.melissa@epa.gov